

California Senior Community Service Employment Program State Plan

Program Years 2016-19 (Stand-Alone)



Acknowledgments

The California Department of Aging (CDA), Senior Community Service Employment Program (SCSEP), would like to express its gratitude to all of those who contributed to crafting the *California SCSEP State Plan* (State Plan). Contributors included the National SCSEP grantees operating in California, Area Agencies on Aging (AAA), local SCSEP projects, the CDA Data Team, and other workforce entities.

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CONTENTS		PAGE
Section 1	Overview of SCSEP in California and State Plan	4
Section 2	Economic Projections and Impact	5
	<ul style="list-style-type: none"> State Long-term Projections for Jobs in Industries and Occupations 	5
	<ul style="list-style-type: none"> Strategic Training Plan for Participants to be Placed in Unsubsidized Employment 	9
	<ul style="list-style-type: none"> State Current and Projected Employment Opportunities for SCSEP Participants 	10
Section 3	Service Delivery and Coordination	13
	<ul style="list-style-type: none"> Actions and Coordination with Other Programs 	13
	<ul style="list-style-type: none"> Long-Term Strategy to Engage Employers to Place Participants in Unsubsidized Employment 	15
	<ul style="list-style-type: none"> Strategy for Serving Minorities 	15
	<ul style="list-style-type: none"> Community Service Needs and Locations 	16
	<ul style="list-style-type: none"> Design Improvement of SCSEP Services to Meet Goals 	18
	<ul style="list-style-type: none"> Strategy for Continuous Improvement in Entered Employment Level of Performance 	19
Section 4	Location and Population Served, Including Equitable Distribution	20
	<ul style="list-style-type: none"> Localities and Populations Where Projects are Most Needed 	20
	<ul style="list-style-type: none"> Equitable Distribution Changes from Prior Year 	22
	<ul style="list-style-type: none"> Equitable Distribution Imbalances and Corrective Steps 	22
	<ul style="list-style-type: none"> State's Long-Term Strategy for Achieving Equitable Distribution 	27
	<ul style="list-style-type: none"> Ratio of Eligible Individuals in Each County and State Total Eligibility Population 	29
	<ul style="list-style-type: none"> Relative Distribution of Eligible Individuals 	31
	<ul style="list-style-type: none"> Avoidance of Disruption of Service 	33
Appendices	Appendix A: CDA SCSEP Area Agency on Aging Sub-Grantee Directory Appendix B: National SCSEP Grantees Operating in California Directory Appendix C: Governor Delegation of Authority Appendix D: Demographic and Labor Market Profile of Californians Age 55 and Older Appendix E: California Area Agencies on Aging Directory Appendix F: California Frontier, Rural and Urban Defined Areas Appendix G: Equitable Distribution (ED) Charts Appendix H: SCSEP Eligible Population Characteristics for Californians Age 55 and Older Appendix I: California Population Aged 55 and Over – Race/Ethnicity by County Appendix J: Public Notification and Comments	

Section 1: Overview of the Senior Community Service Employment Program and Purpose of the State Plan

The Senior Community Service Employment Program (SCSEP) is the only federally mandated job training program serving low-income workers age 55 years and older. SCSEP is authorized under the Older Americans Act (OAA) and administered by the U.S. Department of Labor, Employee and Training Administration (USDOL/ETA). The Government Accountability Office has identified SCSEP as one of only three federal workforce programs with no overlap or duplication. SCSEP's 50-year success record stems from its dual purpose as a training program for low-income older workers and a source of subsidized staff trainees for community-based organizations.

USDOL/ETA distributes SCSEP funds to 15 national SCSEP grantees and 56 state and territorial grantees. The national SCSEP grantees operate across multiple state jurisdictions and receive 78 percent of SCSEP funds. State and territorial SCSEP grantees receive the remaining 22 percent of SCSEP funds.

Program-eligible older workers must be residents of California, 55 years of age or older, unemployed, and have total annual family income that does not exceed 125 percent of the federal poverty guidelines, currently \$14,850 for an individual. Service priority is given to individuals meeting one or more of the following criteria:

- Is a veteran or a spouse of a veteran
- Is 65 years of age or older
- Has a disability
- Has limited English proficiency
- Has low literacy skills
- Resides in a rural area
- Has low employment prospects
- Has failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunities Act (WIOA)
- Is homeless or at risk for homelessness

Eligible individuals receive part-time, subsidized job training through community service assignments (CSA) at non-profit organizations or governmental entities.

The California Department of Aging (CDA) administers the State SCSEP grantee program, contracting with 14 Area Agencies on Aging (AAA) that provide SCSEP services locally (Appendix A). In addition, the following eight national SCSEP grantees provide SCSEP services in California (Appendix B):

- AARP Foundation
- Asociacion Nacional Pro Personas Mayores (ANPPM)
- Experience Works
- National Asian Pacific Center on Aging (NAPCA)
- National Council on Aging (NCOA)
- National Indian Council on Aging (NICOA)
- Senior Service America, Inc. (SSAI)
- SER – Jobs for Progress National, Inc. (SER)

The California SCSEP State Plan PY 2016 -2019 (State Plan) describes how SCSEP and its partners meet the skills training, supportive services, and unsubsidized employment needs of eligible older workers. In addition, the State Plan explains the roles SCSEP and its partners play in the California workforce development system as they relate to community service and private employment. It is the blueprint for preparing SCSEP participants for appropriate employment opportunities in industry sectors projecting growth within the State. The State Plan covers the period July 1, 2016 through June 30, 2020.

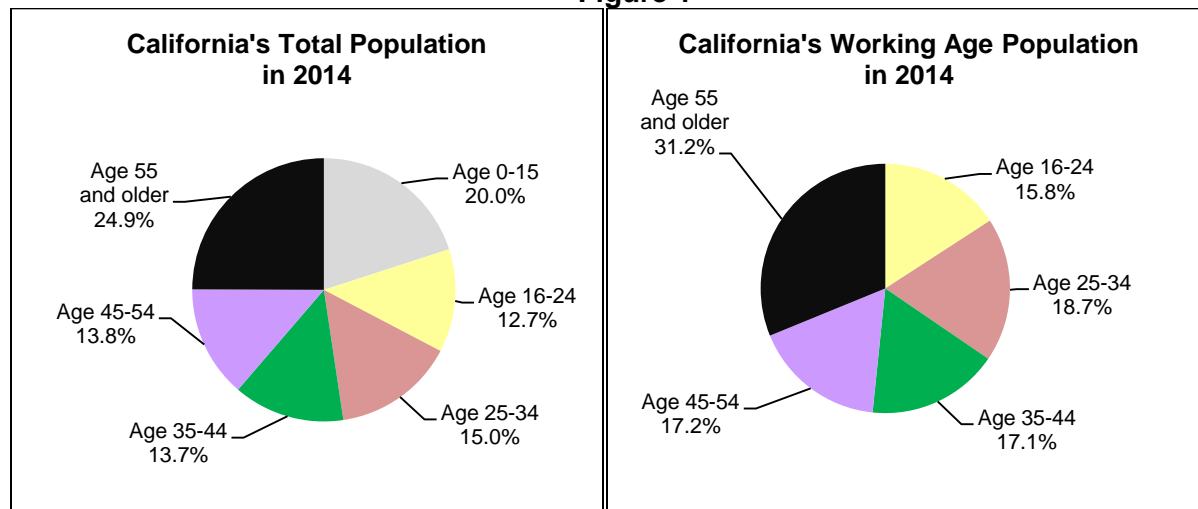
The OAA and federal regulations require the governor of each state to develop a strategic four-year State Plan in collaboration with the national SCSEP grantees, the aging network, and workforce entities operating within their state. Because CDA is California’s designated State Unit on Aging (SUA), Governor Edmund G. Brown Jr. delegated authority to Lora Connolly, CDA Director, to submit the State Plan on his behalf to USDOL/ETA. (Appendix C)

Section 2: Economic Projections and Impact

- *State Long-term Projections for Jobs in Industries and Occupations*

According to the American Community Survey (ACS), California’s population totaled 37.6 million in 2014. The number of Californians age 55 and older totaled 9.3 million, comprising one quarter (24.7 percent) of the state’s total population. The population of Californians age 55 and older can be further broken down as follows: 4.4 million were age 55 through 64, 2.8 million were 65 through 74, and 2.1 million were age 75 and older. Figure 1 shows the age distribution of California’s total and working age populations.

Figure 1

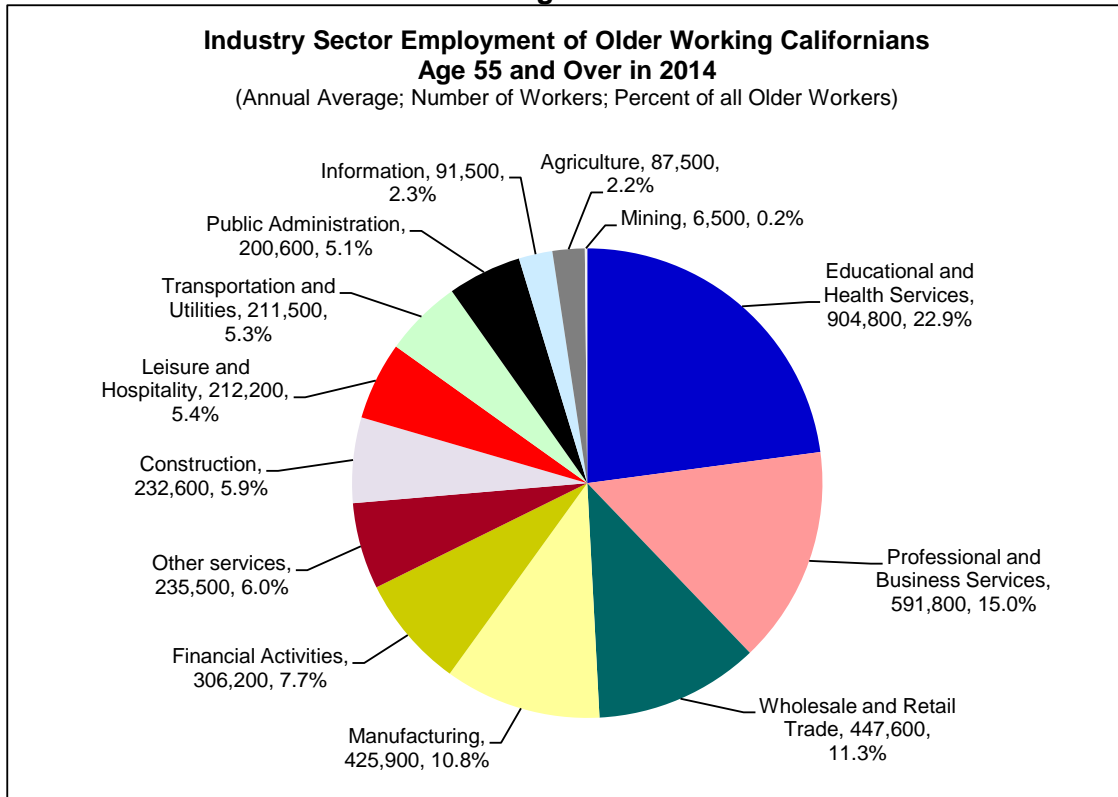


U.S. Source Census Bureau, American Community Survey, 2014. (Appendix D – LMID report, *Demographic and Labor Market Profile of Californians Age 55 and Older.*)

In 2014, older workers made up a much larger share of California's eligible workforce, or the working age population age 16 and over, as compared to previous years. Nearly three out of every 10 (31.2 percent) working age Californians were age 55 and older in 2014. The share of older individuals in California's working age population has grown over time. According to the U.S. Census Bureau's Current Population Survey of Households (CPS) those age 55 and older comprised less than one-quarter (22.6 percent) of California's working age population in 1991. The increasing share of older workers in the working age population reflects the aging of the baby boom generation. In 1991, less than one in 10 (9.5 percent) working age Californians was age 55 through 64. In 2014, nearly one of every seven (14.7 percent) working age Californians was age 55 through 64. The wave of baby boomers reaching retirement age will continue to grow in the near future.

Figure 2 illustrates the employment of older working Californians in 2014 in the 12 industry sectors that are used by the CPS. The largest concentration of older working Californians was in the educational and health services sector, which employed over one-fifth (22.9 percent) of Californians age 55 and older, followed by the professional and business services (15.0 percent of older workers), and wholesale and retail trade (11.3 percent) sectors. These three sectors combined employed about half (49.2 percent) of older Californians in 2014.

Figure 2



Source: U.S. Census Bureau, Current Population Survey of Households, 2014-(Appendix D – LMID report, *Demographic and Labor Market Profile of Californians Age 55 and Older*)

Table 1 illustrates twenty occupations that will employ the largest number of older workers in California. CDA and the national SCSEP Grantees with operations in California (statewide SCSEP network) are training participants through their CSA to enter the occupations highlighted in the table.

Table 1
Twenty Occupations That Employed the Most Older Working Californians in 2014

Occupation	Number
Miscellaneous Managers	139,500
Personal Care Aides	97,600
Secretaries and Administrative Assistants	88,600
Elementary and Middle School Teachers	88,300
Retail Salespersons	84,200
Driver/Sales Workers and Truck Drivers	81,700
Registered Nurses	79,600
Janitors and Building Cleaners	71,100
First-Line Supervisors of Retail Sales Workers	64,800
Chief Executives and Legislators	61,300
Accountants and Auditors	60,500
Maids and Housekeeping Cleaners	55,000
Lawyers, and Judges, Magistrates, and Other Judicial Workers	51,100
Real Estate Brokers and Sales Agents	49,100
Bookkeeping, Accounting, and Auditing Clerks	49,000

Occupation	Number
Postsecondary Teachers	48,500
Office Clerks, General	39,200
Miscellaneous Agricultural Workers, Including Animal Breeders	38,400
Grounds Maintenance Workers	38,100
Customer Service Representatives	37,700

Source: U.S. Census Bureau, American Community Survey, 2014-(Appendix D– LMID report, *Demographic and Labor Market Profile of Californians Age 55 and Older*)

High-demand occupations require varied levels of expertise and have training requirements ranging from on-the-job employer training for entry-level wholesale trade occupations to advanced training coupled with a bachelor’s degree or higher for occupations in professional, scientific, and technical service industries.

Figure 3 displays the 10 occupational groups that employed the largest numbers and shares of working Californians age 55 and older in 2014. Together, these 10 occupations employed nearly three-quarters (74.7 percent) of California’s working older workers in 2014.

Figure 3



Source: U.S. Census Bureau, American Community Survey, 2014-(Appendix D – LMID report, *Demographic and Labor Market Profile of Californians Age 55 and Older*)

Nearly two-fifths (38.3 percent) of older workers in California were employed in professional, management, educational, business, or financial occupations. Management occupations employed the largest number and share (12.6 percent)

of older California workers, followed closely by office and administrative support occupations (12.2 percent). The only other occupational group with an employment share of at least 10 percent and which employed more than 350,000 older workers was sales and related occupations (10.3 percent). These three occupational groups combined employed nearly 1.3 million older workers in 2014, or more than one-third (35.1 percent) of all older workers.

Additional occupational groups employed between 4.9 percent and 6.6 percent of older Californians: education, training, and library occupations (6.6 percent); healthcare practitioner and technical occupations (5.9 percent); business and financial operations occupations (5.8 percent); production occupations (5.6 percent); transportation and material moving occupations (5.4 percent); personal care and service occupations (5.4 percent); and building and grounds clearing and maintenance occupations (4.9 percent). As a group, these seven occupational groups employed two-fifths (39.5 percent) of older California workers, or nearly 1.5 million workers age 55 and older. The 12 remaining occupational groups employed the remaining one-quarter of older workers, or 932,300 workers in total.

- *Strategic Training Plan for Participants to be Placed in Unsubsidized Employment*

In order to maximize SCSEP participant placement in unsubsidized employment in high demand jobs, the statewide SCSEP network will focus their on-the-job training opportunities and host agency recruitment efforts on agencies that can provide training for the following jobs:

- Administrative Assistants
- Customer Service Representatives
- Drivers
- Food Service Workers
- General Office Clerks
- Home Health Aides
- Janitors and Building Cleaners
- Maids and Housekeeping Cleaners
- Personal Care Aides
- Retail Sales Clerks

Many lower-paying occupations require only short-term on-the-job training. The Bureau of Labor Statistics defines short-term on-the-job training as providing the skills needed for a worker to attain competency in an occupation that can be acquired during one month or less of on-the-job experience and informal training.

Training is occupation-specific rather than job-specific. As a result, skills learned can be transferred to another job in the same occupation. This on-the-job training category includes employer-sponsored training programs.

Short-term on-the-job training appears to be one strategy to meet new USDOL/ETA Workforce Innovation and Opportunity Act (WIOA) and SCSEP employment performance goals. California's statewide SCSEP network is encouraging local SCSEP projects to use short-term on-the-job training to increase performance in the Entered Employment Common Measure. The Older Workers Bulletin 04-04 describes on-the-job training as "obtaining an unsubsidized job with a public or private employer that requires specific skills that are not attainable through the regular community service assignment."

- *State Current and Projected Employment Opportunities for SCSEP Participants*

According to the Employment Development Department (EDD)/Labor Market Information Division (LMID) chart, *California - Fastest Growing Occupations 2012-2022*, the occupations that appear to match SCSEP participants' education and training levels include the following:

- Combined Food Preparation and Serving Workers including Fast Food
- Cooks
- Home Health Aides
- Personal Care Aides
- Physical Therapist Aides
- Serving Workers

These occupations require an education level of either some college, or a high school diploma or equivalent, or less than a high school education. A review of the Program Year (PY) 2014 SCSEP Performance and Results QPR (SPARQ) database shows that eighty percent of California's SCSEP participants meet the education and/or experience requirements of these occupations. Hourly wages for the six occupations range from California's minimum wage of \$10.00 per hour to \$14.14 per hour.

Table 2 illustrates the required level of education and on-the job training needed by SCSEP participants to find unsubsidized employment in the fastest growing occupations.

Table 2
California
Fastest Growing Occupations
Requiring a High School Diploma or Equivalent
or Less than a High School Diploma
2012-2022¹

SOC Code*	Occupational Title	Projected Employment 2022	Percent Change 2012-2022	Education and Training Levels		
				Entry Level Education ²	Work Experience	On-the-Job Training ³
39-9021	Personal Care Aides	587,200	51.8%	8	None	ST OJT
31-1011	Home Health Aides	62,400	39.0%	8	None	ST OJT
31-2022	Physical Therapist Aides	7,900	33.9%	7	None	ST OJT
43-6013	Medical Secretaries	88,400	29.1%	7	None	MT OJT
35-2014	Cooks, Restaurant	150,600	28.8%	8	<5 years	MT OJT
35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	362,400	26.7%	8	None	ST OJT
35-1012	First-Line Supervisors of Food Preparation and Serving Workers	105,900	24.7%	7	<5 years	None

¹ Employment Development Department, Labor Market Information Division, Published: September 19, 2014, [http://www.labormarketinfo.edd.ca.gov/file/occproj/cal\\$occfatest.xlsx](http://www.labormarketinfo.edd.ca.gov/file/occproj/cal$occfatest.xlsx)

² High school diploma or equivalent is represented by number seven and less than high school is represented by number 8.

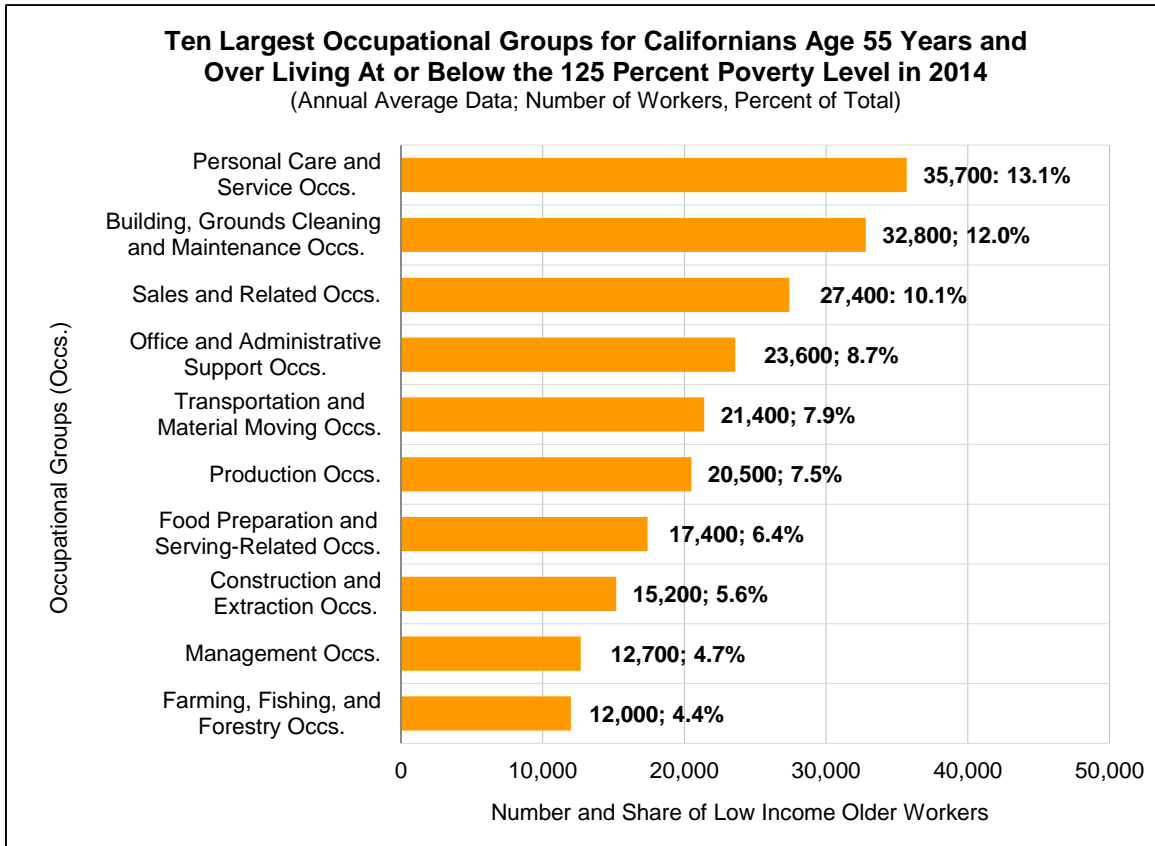
³ ST OJT means short-term on-the-job training and MT OJT means Moderate-term on-the-job training.

CDA requested the EDD/LMID to research occupational employment patterns among older Californians using 2014 ACS data from the U.S. Census Bureau. LMID compared to the occupational employment pattern of older working Californians with the cohort of low-income older workers. These workers are defined as those Californians who are 55 and older and employed, but living at or below the 125 percent poverty level.

Of the nearly 3.7 million Californians age 55 and older who worked, 272,000 (7.4 percent) lived at or below the 125 percent poverty level. The occupational distribution of these workers was very different from that of older workers generally. Figure 4 shows the 10 occupational groups that employed the largest

numbers and share of low-income older workers in California in 2014. These 10 occupational groups employed four out of every five (80.3 percent) low-income working older Californians in 2014.

Figure 4



Source: U.S. Census Bureau, American Community Survey, 2014-(Appendix D – LMID report, *Demographic and Labor Market Profile of Californians Age 55 and Older*)

Of the ten occupations where the largest numbers of low-income older workers are currently employed, the following occupational subgroups represent the typical SCSEP CSA in which participants are placed:

- Office and Administrative Support
 - Administrative Assistants
 - Medical Secretaries
 - Office Clerks
- Sales and Related
 - Retail Sales Clerk
 - Cashiers
 - Customer Service
- Food Preparation and Serving
 - Combined Food Preparation and Serving Workers including Fast Food

- Cooks
- Serving Workers
- Building, Grounds and Maintenance
 - Janitor
 - Landscaping
- Personal Care and Services
 - Home Health Aides
 - Personal Care Aides
 - Physical Therapist Aides

Section 3: Service Delivery and Coordination

- *Actions and Coordination with Other Programs*

The statewide SCSEP network continues to coordinate with American Job Centers (AJC). Local SCSEP projects are required to execute a Memorandum of Understanding (MOU) with their local Workforce Development Board (LWDB) or AJC. The MOU identifies the core services the LWDB will provide to SCSEP participants and the resources the local SCSEP project will provide to the LWDB. A local SCSEP project generally designates the AJC as a host agency site. This allows the SCSEP project to leverage its resources by providing in-kind services to the AJC through the assignment of a SCSEP participant(s) to train at that location.

Recently, USDOL/ETA finalized WIOA regulations describing requirements of WIOA MOUs with WIOA partners. SCSEP is a WIOA partner. The California Workforce Development Board (CWDB) provided CDA with the State WIOA MOU guidance between LWDB and WIOA partners. The California Employment Developments Department's guidance focuses on WIOA partners' cost-sharing expectations for AJC services. While the guidance references in-kind services as allowable to cover cost-sharing expectations, as articulated by SCSEP projects in previous MOUs, monetary cost-sharing is clearly the objective. CDA expressed concerns about the LWDB MOUs and cost-sharing expectations during a recent USDOL/ETA SCSEP All-Grantee Call.

In addition, WIOA does not require the LWDB to have a SCSEP representative on the Board as previously required by the Workforce Investment Act. Without representation on the LWDB, it may be more difficult for SCSEP projects to negotiate a favorable MOU or to exert community influence concerning employment of older workers.

AJCs provide basic core services to registered SCSEP participants. The AJC

core services include basic computer classes, employment search techniques, resume development, interview practice sessions, and access to the CalJOBS employment search database. These core services promote the participants' confidence in their ability to find unsubsidized employment.

CDA is the SUA administering OAA services through contracts with California's 33 AAAs (Appendix E) and coordinates SCSEP activities through SCSEP contracts with many of these agencies. AAAs collaborate with the State's aging network to develop a community-based system to serve adults age 60 and older and their families. AAAs' public planning processes include analyses of local trends and needs. CDA encourages the state SCSEP network to work with the AAAs to exchange ideas, to provide technical assistance on supportive services for older adults, and to refer SCSEP participants who are eligible for OAA services. These services include information and assistance, transportation, family caregiver support, respite, nutrition, legal assistance, and long-term care ombudsman.

According to the *California State Plan on Aging – 2013-2017*, CDA's vision and mission aligns well with statewide SCSEP network goals. CDA envisions every Californian having the opportunity to enjoy wellness, longevity, and quality of life in strong, healthy communities. Its mission is to promote the independence and well-being of older adults, adults with disabilities, and families through:

- Access to information and services to improve the quality of their lives
- Opportunities for community involvement
- Support for family members providing care
- Collaboration with other state and local agencies

CDA sub-grantees are mainly located in urban areas. However, the national SCSEP grantees operating in the State's rural areas are coordinating with the LWDB in these areas. SCSEP projects located in rural areas have more challenges because employment opportunities are not as extensive as in urban areas (Appendix F).

In addition, older individuals living in rural areas do not have access to the public transportation necessary for them to take advantage of the employment and training opportunities available in larger population centers. Transportation access issues are compounded by the time and/or distance involved in traveling between the older individual's home and job training site, high fuel and vehicle maintenance costs, and the ever increasing demand for limited transportation services by a growing population of older adults.

One possible solution to these challenges is mobility management, which manages transportation resources through a systems approach that emphasizes:

- Movement of people instead of vehicles.
- Customer needs and the discrete travel needs of individual consumers.
- Focus on the entire trip, not just a portion of the trip to improve the effectiveness, efficiency, and quality of the travel services delivered.
- Improvements to the information that is available about transportation services.

Mobility management programs are varied and can include volunteer drivers, subsidized taxi fares, public transit passes, mobility training, vehicle repair, or gas vouchers. SCSEP projects may find that Uber is a viable solution to transportation issues in some areas. CDA has worked with AAAs to develop a Mobility Management Implementation Plan. This plan details how AAAs can reduce the challenges associated with limited mobility and may assist SCSEP grantees to support program participants in meeting their transportation needs.

Rural SCSEP projects are aware of these challenges and work to overcome them through collaboration with the LWDB, recruitment of host agencies in remote areas, and providing supportive services.

- *Long-term Strategy to Engage Employers to Place Participants in Unsubsidized Employment*

Local SCSEP projects train participants to help them develop the skills and experience necessary to be competitive in the current labor market. They have established cooperative relationships between the local AJC, host agencies, and public and private employers. Coordination and co-location of services at the AJCs helps to identify suitable job openings in high-demand occupations. Local projects make every effort to establish rapport with employers who offer reliable career pathways and are willing to develop and maintain working partnerships.

- *Strategy for Serving Minorities*

The statewide SCSEP network serves minority individuals at greater percentages than their representation in the State's overall minority population, with the exception of Asian individuals. An in-depth analysis may be needed to understand why the statewide SCSEP network is underserving Asians. Language and cultural barriers may need to be addressed to recruit more Asians into the SCSEP. Table 3 compares the minority representation in California's

general age 55 and older population California 55 and older general population to the statewide SCSEP network population.

Table 3 – Comparison of General Population of Californians Age 55 and Over to the Statewide SCSEP Population

Personal Characteristics	Californians 55 Years and Older General Population ¹	Percentage of Californian 55 and Older General Population	Total Number of California Statewide SCSEP Participants – PY 2014 ²	Percentage of California Statewide SCSEP
Total Population	9,512,647	100.0%	4,030	100.0%
Ethnicity				
Hispanic	1,865,859	19.6%	1,331	33.0%
Race				
American Indian / Native Alaskan	59,032	0.6%	58	1.4%
Native Hawaiian / Pacific Islander	25,854	0.3%	46	1.1%
Asian	1,275,552	13.4%	361	9.0%
Black / African American	501,725	5.3%	989	24.5%
White	5,104,583	53.6%	1821	45.2%

¹ Source: 2014 American Community Survey 1-Year Estimates S0101 Age and Sex, Race & Ethnicity, <http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

² SPARQ PY 2014 CDA Final QPR and national SCSEP grantees Final QPRs

- *Community Service Needs and Locations*

The statewide SCSEP network and their partner agencies identify community service needs through several means. The local projects identify these needs by participating in community needs assessments, information and referral networking, and local planning processes. They also review workforce data to determine which community services might also provide training that is transferable to businesses with high-growth employment opportunities.

Project directors often live and work in the communities they serve and have direct knowledge of both participants' abilities and interests and community employers' unmet needs. In some areas of California, SCSEP staff serve on the LWDB. The statewide SCSEP network has provided training to project directors to develop their skills in implementing an effective employer outreach program. Project directors market SCSEP services and the skills of job-ready participants to private employers and host agencies, thereby increasing the number of participant exits to unsubsidized employment. Some projects also are working on establishing national employer relationships.

California's SCSEP grantees have established cooperative agreements among the local AJCs, community service agencies, and non-profit organizations. Coordination and co-location of services at the AJCs helps to identify suitable job openings. Every effort is made to establish rapport with employers who offer reliable career pathways and are willing to develop and maintain a working partnership.

The local SCSEP project director is responsible for ongoing recruitment of host agency sites. They make SCSEP community outreach contacts by networking at local job fairs, health fairs, senior centers, the Social Security Administration, State and county employers, and non-profit organizations. Host sites offering job placements in retail sales, technical occupations, managerial occupations, food preparation, and healthcare are preparing participants for unsubsidized employment in these occupations.

The statewide SCSEP network is continuously refining its strategies for job development to guide employer outreach and participant job readiness. SCSEP projects attend older adult collaborative meetings to network with local employers and recruit host agencies. Other projects use the local AAA Information and Assistance resource guide to make contacts with potential host agencies. Still others use the newspaper, word of mouth, community meetings, and the Chamber of Commerce to recruit host agencies.

The statewide SCSEP network continuously refines its expertise on the basic elements of job development including skills assessment, resume writing, Individual Employment Plan development, computer training, job placement, and retention. SCSEP accomplishes this through workshops, video conferences, and one-on-one coaching of paid and participant staff.

While assisting SCSEP participants to secure unsubsidized employment is one important program objective, the statewide SCSEP network recognizes the importance of community service for those who may not find unsubsidized employment. Participants value the self-esteem and the social interactions they receive in their community service assignment.

The statewide SCSEP network recognizes the value of community service, too. The SPARQ database tallies the total number of community service hours. In PY 2014, the total number of community service hours provided nationally by SCSEP was 35,326,857. In that same year, the statewide SCSEP network's participants provided 2,140,531 community service hours or 6.1 percent of the total nationwide community service hours. These hours supported services in many communities throughout the State. Community service placements are a

win/win opportunity for both the host agencies that benefit from the participants' assistance in providing local services and the participants themselves whose placement gives them the training and work experience needed to find an unsubsidized position.

- *Design Improvement of SCSEP Services*

After being informed that the CWDB would be submitting a WIOA Integrated State Plan instead of a WIOA Combined State Plan, CDA reached out to the national SCSEP grantees operating in the State to begin work on the stand-alone State Plan. CDA solicited the national SCSEP grantees for ideas and items they wanted included in the State Plan.

On December 10, 2015, CDA conducted a conference call with representatives of the national SCSEP grantees. The discussion focused on the following topics:

- Possible SCSEP Performance Measure changes that align with WIOA Performance Measures
 - Concerns about Education/Certificates Performance Measures
- State minimum wage increases and their effect on the Equitable Distribution (ED) positions and performance
- Other administrative/participant benefit costs that affect performance including:
 - California's paid sick leave law
 - Localities charging per participant/employee transportation fees
 - Workers' Compensation costs
- Rural Host Agency Recruitment and Challenges
- How the Internal Revenue Service will classify SCSEP participants with regard to the USDOL/ETA determination request in the Affordable Care Act
- SPARQ's improvement and/or replacement

In addition, the national SCSEP grantees provided information by responding to CDA's email questionnaire. Their responses are included in the State Plan.

Concerning the minimum wage challenge, the California Secretary of State recently qualified two minimum wage increase initiative measures for placement on the November 2016 statewide ballot. The initiative measures are entitled "Raise California's Wage and Paid Sick Days Act of 2016" and the "Fair Wage Act of 2016." If the voters pass either one of the initiative measures, then the California minimum wage will incrementally rise to \$15.00 per hour by January 2021. Furthermore, on

April 6, 2016, Governor Brown signed into law Senate Bill 3 which will raise California's minimum wage to \$15.00 per hour by January 2022.

The federal minimum wage of \$7.25 per hour is the basis for the ED of authorized SCSEP positions for all grantees. A \$15.00 per hour minimum wage will reduce the number of authorized ED positions by more than 50 percent. CDA's SCSEP sub-grantees have expressed difficulty justifying ever-increasing wage costs while serving fewer and fewer participants. CDA anticipates that some of its SCSEP sub-grantees may terminate their contracts. Minimum wage increases will affect the long-term integrity of California's SCSEP network and that of other states with minimum wage levels that are higher than the federal minimum wage.

Another area affecting the statewide SCSEP network's performance goals is the California's new "Healthy Families/Healthy Workplace Act" which requires that all employees in California receive 24 hours of annual paid sick leave. According to the California Department of Industrial Relations, which administers State labor law, SCSEP participants are beneficiaries of the paid sick leave law even though they are trainees in a federal program. CDA contacted the National SCSEP Office for guidance regarding this law. The National SCSEP Office confirmed CDA would have to abide by State law.

The high cost of workers' compensation insurance in California is another administrative challenge facing the State SCSEP network. According to the Insurance Journal, California's workers' compensation rates are the most expensive in the United States: \$3.48 per \$100 of payroll.¹ With SCSEP administrative costs fixed at 13.5 percent of the grant award, the statewide SCSEP network is trying continuously to find solutions to these challenges.

- *Strategy for Continuous Improvement in Entered Employment Level of Performance*

The Entered Employment performance goal challenges some of CDA's SCSEP sub-grantees. As noted previously, since the 2008 recession California's unemployment rate has been one of the highest in the country when compared to other states' unemployment rates. Even with the high unemployment rate, a few of the CDA SCSEP sub-grantees exceeded their entered employment performance goals. CDA staff conducted an analysis of why these CDA SCSEP sub-grantees were successful in meeting unsubsidized employment goals for

¹ <http://www.insurancejournal.com/news/west/2015/08/05/377607.htm>

their participants. Their success appears to correlate to the following:

- Contracting SCSEP services directly with an AJC
- Forming Job Clubs for their participants
- Fostering local employer relationships
- Collaborating with other employment programs
- Participating in Job Fairs

In PY 2014, CDA provided two regional job development trainings to the SCSEP sub-grantees. The national SCSEP grantees received invitations to attend this training as well. The Northern California Regional Training occurred March 25-26, 2015, at CDA in Sacramento. Attendees included CDA's SCSEP sub-grantees, AARP, NICOA, and SER – Jobs for Progress. The Southern California Regional Training occurred April 8-9, 2015, at the Los Angeles County AAA. Attendees included CDA SCSEP sub-grantees, ANPPM, and NAPCA.

Training topics included:

- Job Development
 - Presentations from AARP, Sacramento Employment and Training Agency, Sacramento County Workforce, California Indian Manpower Consortium, Jewish Family Service of San Diego, Los Angeles County WIOA Business Services, Los Angeles County CalWORKs
- Workers Compensation
 - Presentations from the Department of Industrial Relations
- Strategies for Attaining Performance Goals
- Data Validation
- Open Discussion about Job Development

This training appears to have been successful – through the second quarter of PY 2015, CDA's level of achievement under the Entered Employment Performance Measure improved significantly.

Section 4: Location and Population Served, Including Equitable Distribution

- *Localities and Populations Where Projects are Most Needed*

The USDOL/ETA ensures that the provision of SCSEP services is equitable within the State through an Equitable Distribution (ED) plan, in accordance with the OAA. USDOL/ETA uses county census data and annual program appropriations to calculate the allocation of authorized positions for each county

in the State. The number of authorized positions is proportional to the number of eligible people in the county when compared to the eligible State population.

California is divided into three main socioeconomic areas: the large urban centers located near the coast; the agricultural centers located mid-State; and, the rural areas located in Northern California and along the eastern mountain counties of the State. Each of these areas has unique challenges for the statewide SCSEP network.

California is the most populous state in the United States, and has the highest number of SCSEP eligible older individuals. According to 2014 American Community Survey (ACS), more than 1,250,000 Californians were 55 years or older and had an income of 125 percent or less of the Federal Poverty Guidelines. In addition, the 2014 ACS estimates that there are 272,000 low-income employed older Californians. Consequently, there are approximately 978,000 Californians eligible for the program.

Authorized positions are needed in California's urban areas, including Los Angeles, San Diego and the San Francisco Bay Area where, large concentrations of program-eligible minority and most-in-need individuals live. In PY 2014, there were 3,417 SCSEP authorized positions in California, this number includes the national SCSEP grantees' and CDA's authorized positions. Thirty-one percent or 1,061 of the authorized positions were located in Los Angeles County, 13.5 percent or 463 of the authorized positions were located in the San Diego area including Orange County, and 12.6 percent or 432 or 12.6 percent of the authorized positions were located in the San Francisco Bay Area. The total number of authorized positions located in these three areas came to 1,956 or 57.2 percent of California's authorized positions. See Appendix H to view the demographics of the State's 58 counties.

California's agricultural regions have large populations of low-income workers, many of whom experience seasonal unemployment. SCSEP is needed in these areas because many in the eligible SCSEP population have barriers to employment that include limited English proficiency, low literacy skills, or low educational attainment. California's agricultural areas tend to have higher unemployment rates than its affluent coastal areas. To improve service to these most in need areas, CDA's approved ED strategy is to review LMID county unemployment rates to determine where authorized positions are most needed.

The LMID tracks and compiles the unemployment rate for each county in the State and is responsible for reporting unemployment and other labor market information to the U.S. Department of Labor's Bureau of Labor Statistics. Since

LMID is a reputable and reliable source for determining minor ED changes, as referenced in the preamble to Title 20 CFR, Senior Community Service Employment Program, Final Rule. CDA did not make any minor adjustments this year because the LMID unemployment rates have improved in most counties.

Rural areas have an even greater need of SCSEP services because of the social isolation of older individuals living in these areas and the limited employment opportunities that are available. In addition, older individuals living in rural areas do not have access to the public transportation that would make it easier for them to take advantage of employment and training opportunities. Transportation issues are compounded by fuel costs, vehicle maintenance costs, and the time and/or distance involved in traveling between a participant's home and the training site. Rural SCSEP projects must consider these additional factors when a participant is assigned to a host agency.

AARP, Experience Works, and SER Jobs for Progress provide services to the State's rural areas. In PY 2014, these three national SCSEP grantees served 346 SCSEP participants or 12.5 percent of the total modified positions in California's in rural counties. These grantees coordinate with the LWDB in their rural areas to meet SCSEP participants' needs (Appendix F).

- *Equitable Distribution Changes from Prior Year*

On February 5, 2016, the USDOL/ETA provided the ED report to all SCSEP grantees. CDA will not make any ED changes from the prior year because of the National SCSEP Competition now in progress. The National SCSEP Competition occurs every four years and involves only the national SCSEP grantees. The national SCSEP grantees with operations in the State have not informed CDA of any ED changes. CDA assumes that they are also waiting to learn the outcome of the National SCSEP Competition. However, once the National SCSEP Competition is completed, CDA will work with the statewide SCSEP network to ensure ED goals are met. See ED Reports in Appendix G.

- *Equitable Distribution Imbalances and Corrective Steps*

CDA contracts exclusively with the State's Area Agencies on Aging (AAA) to provide Older Americans Act (OAA) services. The following 14 AAAs provide State SCSEP services:

- Division of Aging, Marin County Department of Health and Human Services (CA005)
- Alameda County Area Agency on Aging (CA009)
- Sourcewise Community Resource Solutions (CA010)

- San Joaquin County Department of Aging (CA011)
- Fresno-Madera Area Agency on Aging (CA014)
- Kings-Tulare Area Agency on Aging (CA015)
- Ventura County Area Agency on Aging (CA018)
- Los Angeles County Area Agency on Aging (CA019)
- San Bernardino County Department of Aging & Adult Services (CA020)
- County of Riverside Office on Aging (CA021)
- Orange County Office on Aging (CA022)
- County of San Diego Aging and Independence Services (CA023)
- City of Los Angeles Department of Aging (CA025)
- Stanislaus County Department of Aging and Veterans Services (CA030)

In addition, the eight national SCSEP grantees with operations in California serve the following areas:

- AARP Foundation (AARP)
 - Provides SCSEP services to the central valley counties and the rural eastern border counties of Sacramento, El Dorado, Mono, Stanislaus, Merced, Fresno, Kings, Tulare, and Inyo
- Asociacion Nacional Pro Personas Mayores (ANPPM)
 - Provides SCSEP services to large urban counties with a large Hispanic presence, including Ventura, Los Angeles, and San Bernardino
- Experience Works, Inc. (EW)
 - Provides SCSEP services to the agricultural and rural counties of Northern California, including Del Norte, Siskiyou, Modoc, Humboldt, Trinity, Shasta, Lassen, Plumas, Tehama, Mendocino, Lake, Glenn, Butte, Sierra, Yuba, Nevada, Colusa, Sutter, Yolo, Sonoma, Solano, Placer and Napa
- National Asian Pacific Center on Aging (NAPCA) – Regular Grant and Set-Aside Grant
 - Provides SCSEP services to urban counties with a large Asian and Pacific Islander presence including San Francisco, San Mateo, Santa Clara, Los Angeles, and Orange
- National Council on the Aging, Inc. (NCOA)
 - Provides SCSEP services to the San Francisco Bay Area counties of Marin, San Francisco, San Mateo, Santa Clara, Santa Cruz, and San Benito
- National Indian Council on Aging, Inc. (NICOA) – Set-Aside Grant
 - Provides SCSEP services to counties with a large Native American presence, including, San Diego, Imperial, Los Angeles, Riverside, and San Bernardino

- Senior Service America, Inc. (SSAI)
 - Provides SCSEP services to the coastal counties of Santa Barbara, San Luis Obispo, Monterey, Alameda, and Contra Costa
- SER – Jobs for Progress National, Inc. (SER)
 - Provides SCSEP service to central valley agricultural, rural mountain, and the southern counties including, San Joaquin, Amador, Calaveras Tuolumne, Mariposa, Madera, Kern, Los Angeles, Orange, Riverside, San Diego, Imperial

Table 4. CDA and the National SCSEP Grantees Operating in the State Service Areas, Eligible Individuals, and Total Authorized SCSEP Positions in the Service Areas

Provider	California Counties	Age 55 and Over¹	Age 55 and Over & At or Below 125 Percent of Poverty Level¹	Total Authorized SCSEP Positions in Counties²
State of California - California Department of Aging	Alameda, Fresno, Kings, Los Angeles, Madera, Orange, Riverside, San Bernardino, San Diego, San Joaquin, Santa Clara, Stanislaus, Tulare, and Ventura	6,749,043	914,875	764
AARP Foundation	El Dorado, Fresno, Inyo, Kings, Merced, Mono, Sacramento, Stanislaus, and Tulare	641,315	138,424	331
Asociacion Nacional Pro Personas Mayores	Los Angeles, San Bernardino, and Ventura	3,043,138	469,040	416
Experience Works, Inc.	Butte, Colusa, Del Norte, Glenn, Humboldt, Lake, Lassen, Mendocino, Modoc, Napa, Nevada, Placer, Plumas, Shasta, Sierra, Siskiyou, Solano, Sonoma, Sutter, Tehama, Trinity, Yolo, and Yuba	868,315	101,284	287
National Asian Pacific Center on Aging (Grant)	Los Angeles	2,377,750	382,955	90

Provider	California Counties	Age 55 and Over¹	Age 55 and Over & At or Below 125 Percent of Poverty Level¹	Total Authorized SCSEP Positions in Counties²
National Council on the Aging, Inc.	Marin, San Benito, San Francisco, San Mateo, Santa Clara, and Santa Cruz	1,060,937	120,424	263
Senior Service America, Inc.	Alameda, Contra Costa, Los Angeles, Monterey, San Luis Obispo, and Santa Barbara	3,371,996	484,740	342
SER - Jobs for Progress National, Inc.	Amador, Calaveras, Imperial, Kern, Los Angeles, Madera, Mariposa, Orange, Riverside, San Diego, San Joaquin, and Tuolumne,	4,937,967	702,285	924
Total				3417

¹ Source - 2014 American Community Survey 1-Year Estimates S0101 Age and Sex, Race & Ethnicity and Table S21043A - Age by Ratio of Income to Poverty Level (125%) in the Past 12 Months for the Population for Whom Poverty Status is Determined

² Source - www.SCSEPED.org - 2014 California Authorized Positions

As the State SCSEP grantee, CDA is mandated to negotiate ED changes with all SCSEP grantees operating in California. The statewide SCSEP network enjoys a strong cooperative partnership. National SCSEP grantees are invited to attend the CDA trainings, to exchange information and share strategies for program improvement. CDA communicates frequently with California’s national SCSEP grantees to provide and receive technical assistance (TA), exchange policy information, and facilitate the transfer of program participants. This collaborative relationship has resulted in successful ED negotiations.

Previously, CDA used the following process to achieve ED of authorized SCSEP positions in the State:

1. Received USDOL/ETAETA’s updated ED Report.
2. Reviewed the ED Report to determine changes to SCSEP authorized positions in geographic service areas.
3. Forwarded the ED Report with State authorized position changes to national SCSEP grantees for review.
4. Tabulated national SCSEP grantees requests and reviewed the ED Report to determine which counties appear over-served or underserved.

5. Informed national SCSEP grantees which counties were over-served or underserved.
6. Negotiated with the national SCSEP grantees to move authorized positions from over-served areas to underserved areas.
7. Scheduled conference calls with the national SCSEP grantees to complete ED negotiations and finalize the ED Report.
8. Submitted Final California ED Report to USDOL/ETAETA.

ED negotiations between CDA and California's national SCSEP grantees strived to achieve position parity in each county. In cases where parity cannot be reached, CDA's ED policy is to ensure each county's maximum number of over-served participants at plus ten positions and the maximum number of underserved participants at minus ten positions (+10/-10), depending on the population of eligible participants in the county. This parity policy and practice was agreed upon and adopted by the State and National SCSEP grantees operating in California over a decade ago. The parity policy is annually reexamined to determine if changes to the parity policy are needed.

Recently, USDOL/ETA initiated new ED Report procedures which require the State to analyze enrollment data located on the USDOL/ETA SCSEP ED website, www.SCSEPED.org, to determine over-served and underserved areas. The new procedure does not require ED negotiations between CDA and the statewide SCSEP network. CDA submitted an ED Report directly to USDOL/ETA. In addition, the national SCSEP grantees in the State are responsible for analyzing their own enrollment data on the www.SCSEPED.org website to determine over-served and underserved areas and how they would address imbalances. They submitted a separate ED Report directly to USDOL/ETA and one to CDA.

Data on the www.SCSEPED.org website suggest that the statewide SCSEP network is underserving in most areas because it is based on authorized position data. Authorized positions are calculated using the federal minimum wage of \$7.25 per hour, which is significantly lower than California's \$10.00 minimum hourly wage. CDA and the national SCSEP grantees enroll participants based on SCSEP modified positions. Modified positions are calculated using the State's higher minimum wage. For example, in PY 2014, CDA SCSEP was awarded 764 authorized positions which actually equated to 619 modified positions because of the State's higher minimum wage.

CDA examined the data on the [www.SCSEPED.org website](http://www.SCSEPED.org), and concluded that most of SCSEP projects in the statewide SCSEP network are on track to meet ED expectations when modified positions are taken into consideration.

- *State's Long-term Strategy for achieving Equitable Distribution*

As stated previously, CDA initiated a strategy to make minor ED changes after reviewing LMID county unemployment rates and minimum wage changes. In particular, this strategy provides additional authorized positions to counties with persistent unemployment, mainly agricultural counties and rural counties.

Considering a county's unemployment rate as part of the ED process gives the statewide SCSEP network an opportunity to place authorized positions in service areas with the greatest need. In addition, CDA will continue the USDOL/ETA approved long-term strategy to achieve ED as described in detail on page 26.

AARP, ANPPM, CDA, EW, NAPCA, NCOA, SSAI, and SER Jobs for Progress serve the 23 urban counties in California. AARP, EW, and SER Jobs for Progress serve the 34 rural counties in California. CDA's long-term ED strategy for county parity ensures that the State's rural and urban areas' ED needs will be addressed.

EW has the largest number of rural area participants. EW expressed that resources for training and employment are limited in rural areas. SCSEP participant-to-staff ratios are small and it is cost-effective to facilitate training through the use of online technology and to supplement in-person staff meetings with individual and group video conferencing.

To ensure ED in rural areas, EW has made online training available to all participants through its JobReady occupational and soft skills training program. Many of these online courses result in occupational certifications that participants can submit with their job applications.

- The occupational courses available to participants include:
 - Essential Math Skills
 - Essential Office Skills
 - Essential Reading and Comprehension Skills
 - Essential Sales Skills
 - Essential Telephone Skills
 - Green Industries and Occupations
 - Telework Fundamental
 - Social Networking for Users

- Fundamentals of Exceptional Customer Service,
 - Business Writing, Editing and Proofreading
- The personal skill courses available to participants include:
- Money Management Fundamentals
 - Personal Health Management
 - Essential Interpersonal and Teamwork Skills
 - Customer Service Skills
 - Communication
 - Time and Priority Management

Other rural SCSEP and ED challenges are discussed on page 22.

Program regulations require grantees to give priority service to individuals with one more of the following characteristics:

- Is a veteran or a spouse of a veteran
- Is 65 years of age or older
- Has a disability
- Has limited English proficiency
- Has low literacy skills
- Resides in a rural area
- Has low employment prospects
- Has failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunities Act (WIOA)
- Is homeless or at risk for homelessness

The statewide SCSEP network employs the following outreach and recruitment strategies to ensure priority for service is given to eligible individuals with the greatest economic need, greatest social need, and those with minority status:

- Uses outreach materials such as pamphlets, brochures, and flyers that are in languages of the specific target group.
- Locates offices in culturally and ethnically diverse neighborhoods.
- Assigns SCSEP participant monitors to AJCs in areas with large populations of older individuals.
- Assigns SCSEP participant monitors to AJCs in areas where minority populations reside.
- Makes presentations at social service agencies, especially those serving older individuals and minority communities.

- Runs advertisements in local journals, magazines, and media accessed by target populations.
 - Networks with organizations serving veterans, disabled individuals, older adults, and minority individuals.
 - Prepares public service announcements for media providers targeting priority service markets
 - Consults with national SCSEP grantees, specifically those grantees providing services to minority older individuals, on recruitment and outreach techniques
- *Ratio of Eligible Individuals in Each County and State Total Eligibility Population*

Table 5 shows the ratio of SCSEP eligible individuals in each service area to California's total SCSEP eligible population.

Table 5 – Ratio of Eligible Individuals in Each Service Area to California's Total Eligible Population

State and County	Total 55 and Older Population	Total 55 and Older and Low Income Population (Income < or = to 125 Percent of Federal Poverty Guidelines)	Ratio as a Percentage of Eligible Individuals in Each Service Area to Total Eligible Population in the State	County	Total 55 and Older Population	Total 55 and Older and Low Income Population (Income < or = to 125 Percent of Federal Poverty Guidelines)	Ratio as a Percentage of Eligible Individuals in Each Service Area to Total Eligible Population in the State
California	9,512,647	1,250,357					
Alameda	395,326	44,845	3.57%	Alpine	439	70	0.006%
Amador	15,709	1,525	0.12%	Butte	67,851	9,705	0.78%
Calaveras	19,624	2,440	0.20%	Colusa	5,327	684	0.05%
Contra Costa	300,810	25,590	2.05%	Del Norte	8,145	1,845	0.15%
El Dorado	63,895	4,785	0.38%	Fresno	206,144	34,330	2.74%
Glenn	7,664	1,440	0.12%	Humboldt	40,324	5,785	0.46%
Imperial	39,850	9,460	0.76%	Inyo	6,963	1,025	0.08%

County	Total 55 and Older Population	Total 55 and Older and Low Income Population (Income < or = to 125 Percent of Federal Poverty Guidelines)	Ratio as a Percentage of Eligible Individuals in Each Service Area to Total Eligible Population in the State	County	Total 55 and Older Population	Total 55 and Older and Low Income Population (Income < or = to 125 Percent of Federal Poverty Guidelines)	Ratio as a Percentage of Eligible Individuals in Each Service Area to Total Eligible Population in the State
Kern	174,067	28,495	2.28%	Kings	27,478	4,245	0.34%
Lake	24,119	4,675	0.37%	Lassen	7,903	1,085	0.09%
Los Angeles	2,377,750	382,955	30.63%	Madera	36,741	6,020	0.48%
Marin	91,083	6,800	0.54%	Mariposa	7,705	1,000	0.08%
Mendocino	30,366	4,835	0.39%	Merced	53,411	9,330	0.75%
Modoc	3,557	640	0.05%	Mono	3,808	364	0.03%
Monterey	98,859	11,305	0.90%	Napa	42,776	4,130	0.33%
Nevada	41,372	4,160	0.33%	Orange	782,970	79,080	6.32%
Placer	115,344	9,255	0.74%	Plumas	8,310	1,095	0.09%
Riverside	556,604	72,450	5.79%	Sacramento	365,317	48,540	3.88%
San Benito	13,556	1,654	0.13%	San Bernardino	444,865	66,370	5.31%
San Diego	786,963	93,795	7.50%	San Francisco	226,254	41,160	3.29%
San Joaquin	162,004	22,555	1.80%	San Luis Obispo	88,430	8,490	0.68%
San Mateo	209,085	16,920	1.35%	Santa Barbara	110,821	11,555	0.92%
Santa Clara	446,293	45,910	3.67%	Santa Cruz	74,666	7,980	0.64%
Shasta	61,004	7,810	0.62%	Sierra	1,432	295	0.02%
Siskiyou	17,595	2,975	0.24%	Solano	115,336	10,445	0.84%

County	Total 55 and Older Population	Total 55 and Older and Low Income Population (Income < or = to 125 Percent of Federal Poverty Guidelines)	Ratio as a Percentage of Eligible Individuals in Each Service Area to Total Eligible Population in the State	County	Total 55 and Older Population	Total 55 and Older and Low Income Population (Income < or = to 125 Percent of Federal Poverty Guidelines)	Ratio as a Percentage of Eligible Individuals in Each Service Area to Total Eligible Population in the State
Sonoma	156,910	14,595	1.17%	Stanislaus	122,865	18,075	1.45%
Sutter	24,680	3,600	0.29%	Tehama	19,815	3,305	0.26%
Trinity	5,821	870	0.07%	Tulare	91,434	17,730	1.42%
Tuolumne	22,020	2,510	0.20%	Ventura	220,523	19,715	1.58%
Yolo	45,882	5,390	0.43%	Yuba	16,782	2,665	0.21%

Source: 2014 American Community Survey 1-Year Estimates S0101 Age and Sex, Race & Ethnicity

Table S21043A - Age by Ratio of Income to Poverty Level (125%) in the Past 12 Months for the Population for Whom Poverty Status is Determined

See additional charts located in Appendix H and Appendix I.

- *Relative Distribution of Eligible Individuals*

The statewide SCSEP network will continue to target resources to ensure equitable service to specific populations and intensify its recruitment efforts in local communities to increase participation by priority service groups. Table 6 compares the State's 65 and older general population characteristics to the State's SCSEP participant numbers of eligible individuals to whom the OAA mandates giving priority service.

Table 6 – Priorities for Community Service Employment

SPARQ Personal Characteristics¹	General Population 65+²	Total California SCSEP Participants³
Age 65 and older	4,900,000	1,315
Individuals with severe disability ^{4,5}	n/a	97
Individuals with limited English Proficiency ⁴	2,283,400	1,233
Individuals with low literacy skills ⁴	1,538,600	495
Individuals residing in rural areas ^{4,5}	n/a	346
Veterans (or their spouses) ⁴	1,705,200	404
Individuals with low employment prospects ^{4,5}	n/a	4,030
Individuals who failed to find employment after using WIA Title I ^{4,5}	n/a	1,041
Individuals who are homeless or at risk of homelessness ^{4,5}	n/a	1,967

(1) SPARQ Personal Characteristics PY 2014 (PY 2015 final information not available at time of report)

(2) *Demographic and Labor Market Profile of Californians Age 55 and Older*, Employment Development Department, Labor Market Information Division; low literacy is defined as 9th grade or less

(3) Total SCSEP participant numbers include results from the eight national SCSEP grantees operating in California and California State grantee, including the set-asides grantees

(4) Information not available for individuals 65 + or the general population.

(5) SPARQ Characteristics are individuals 55+

Table 7 compares the characteristics of the State’s 55 and older general population to the characteristics of the State’s SCSEP participants.

Table 7 – Other SCSEP Eligible Individuals

SPARQ Personal Characteristics ¹	General Population of Age 55+	Total California SCSEP Participants ²
Family income at or below the poverty level ³	1,068,000	3,932
Individuals with disabilities ⁴	2,538,900	359
Individuals receiving public assistance ⁵	n/a	2,179

(1) SPARQ Personal Characteristics for 2014

(2) Total SCSEP participant numbers include results from the eight national SCSEP grantees operating in California and California State grantee including set-aside grantees

(3) *Demographic and Labor Market Profile of Californians Age 55 and Older*, Employment Development Department, Labor Market Information Division

(4) 2014 American Community Survey 1-Year Estimates S0101 Age and Sex, Race & Ethnicity; Table S21043A - Age by Ratio of Income to Poverty Level (125%) in the Past 12 Months for the Population for Whom Poverty Status is Determined

(5) Information not available for individuals 55 + or the general population

- *Avoidance of Disruption of Service*

Because the statewide SCSEP network does not know what the results of the current National SCSEP Competition will be, there is the possibility of service disruption to participants within the State. CDA and the national SCSEP grantees will coordinate to avoid disruption of services to participants transferring from one grantee to another. The statewide SCSEP network will clearly communicate with participants, host agencies, and each other to minimize any disruption of services.