

Senate Health, Education, Labor and Pensions Committee
Subcommittee on Retirement Security and Aging
Hearing on the Senior Community Service Employment Program
Older Americans Act (Title V)

March 28, 2006

Written Statement of
Anthony R. Sarmiento
Executive Director
Senior Service America Inc.

Senators Enzi, Kennedy, DeWine, and Mikulski, and Members of the Committee:

As the Executive Director of Senior Service America, I appreciate this opportunity to share our views on the reauthorization of the Senior Community Service Employment Program under Title V of the Older Americans Act.

Senior Service America is the third largest national SCSEP grantee funded by the U.S. Department of Labor. Since 1968, we have operated SCSEP exclusively through subgrants to local community-based, faith-based, and publicly-funded organizations. Currently, our 108 local partners operate SCSEP in 257 rural, urban, and suburban counties in 23 states and the District of Columbia. Among our partners are local affiliates of Catholic Charities, Jewish Vocational Services, and the National Urban League; community action agencies and other community-based organizations; rehabilitation agencies; institutions of higher education; local area agencies on aging; workforce development agencies; senior centers; and regional councils of government. Our subgrantees operate an array of programs in addition to SCSEP.

Each year since the 2000 reauthorization, our diverse network of subgrantees has surpassed the contractual goals of our grant with the Labor Department. In Program Year 2004-2005, our subgrantees exceeded their performance goals during the first full year of operation under the final SCSEP Rules (issued in April 2004) and the implementation of a new, far-reaching, and mandatory SCSEP data collection system. Last year, our program enrolled over 11,000 participants, who provided nearly 5.5 million hours of paid community service at over 2,800 local nonprofit and public agencies. We accomplished these goals and expended 75% of our funds to pay the wages and fringe benefits of SCSEP participants.

We believe that the performance of Senior Service America's subgrantee network demonstrates that Congress was on target when it significantly strengthened and modernized SCSEP during the last reauthorization in 2000. Under the current law and regulations, a wide range of organizations are able to accomplish SCSEP's dual missions of employing our nation's most vulnerable seniors to (1) provide needed services in their community and (2) secure unsubsidized employment.

In our opinion, the latest research on older workers, adult learning, and civic engagement published since the last reauthorization only reinforces that SCSEP is both a valid and necessary program for another five years. If SCSEP had not been established over forty years ago, experts on aging today most likely would be calling for creating a new program just like SCSEP as part of a larger, comprehensive national response to our aging society. We think that the nine million seniors who will be poor or near poor in the next decade (and therefore eligible for SCSEP) would be best served if Congress reaffirmed in 2006 the same purposes and delivery system for SCSEP as in 2000.

Using the latest “buzz” words in aging, we would argue that SCSEP is a proven civic engagement program for disadvantaged seniors. Too often unrecognized or overlooked as assets in their communities, tens of thousands of low-income seniors are doing real and valuable work that would be sorely missed. The structure and rewards of paid employment (even at the minimum wage) promote not only the acquisition of skills but also a boost in self-esteem and self-awareness. In short, SCSEP is transforming their lives and building their communities.

For these reasons, we concur with the attached document which describes a vision and rationale for SCSEP that was adopted by the national SCSEP grantees last January, prior to the Labor Department’s release of its own Legislative Principles for reauthorizing SCSEP. Instead of reiterating the principles described in this joint document, I wish to provide additional information we received from our subgrantees and focus the rest of my testimony on several key points.

In preparation for this hearing, we invited our subgrantees to submit their views on aspects of the Labor Department’s proposals. (If requested, we will provide a summary of all responses at a later date.) More than 50 of our subgrantees have responded to our invitation, along with a handful of state SCSEP directors. Based on their recommendations, there was unanimous support for the following:

- Maintaining SCSEP’s primary emphasis on community service employment
- Keeping the minimum age of eligibility at 55

All of our subgrantees who submitted comments agreed that the capacity of their participating host agencies, large and small, would be greatly diminished if national SCSEP grantees either chose or were required to cut back their expenditures on paid community service employment for SCSEP participants. Currently, the Older Americans Act requires that 75% of all SCSEP funds must be spent on paying wages and benefits to SCSEP participants. This budget policy enhances the availability of SCSEP participants to work in various agencies, including many that are integral to the larger network of service providers to the elderly under the Older Americans Act, including:

- Meals on Wheels and other senior nutrition programs
- Elder care and child care
- Senior centers

For instance, the SCSEP project director of our subgrantee in Lisbon, Ohio, reminded us of a news story he sent us last summer from the “Salem News,” quoting Iris Marshalek, the director of the local office on aging, about her three SCSEP participants: “Without their assistance, we would not be able to have senior day care...they are life savers.”

Other types of agencies that would be jeopardized by a cutback on paid community service employment include libraries, especially in rural areas, and One Stop Career Centers, where SCSEP participants often serve as specialists for all older job seekers.

A cutback in paid community service employment would also discourage innovative projects such as the cultural tourism and oral history initiative that we launched last summer in south central Louisiana, the heart of Acadiana. Before Hurricanes Katrina and Rita struck, we supported two of our subgrantees, the Evangeline Council on Aging and Lafayette Council on Aging, to train SCSEP participants on conducting and transcribing interviews with older residents about local history and culture. In conjunction with the University of Louisiana in Lafayette, this project is part of an emerging economic development effort linked to local tourism. Despite the hurricanes, the SCSEP participants are completing oral histories, including several narratives of survival and recovery. While the project is unlikely to lead directly to unsubsidized employment opportunities in the immediate future, it has provided participants with the opportunity to contribute to documenting the history of their communities and enhance their communications and writing skills.

A few of our subgrantees who submitted comments supported an increase in classroom training for SCSEP participants, primarily to supplement—not replace—paid community service employment as the primary activity that best fits the needs of the majority of their SCSEP-eligible population. It is our view that Congress could increase classroom opportunities for SCSEP participants without taking away resources for community service employment by revising or eliminating the current Section 502(e) and considering “National Activities” as proposed by the Labor Department.

In addition, we support the Department’s aim to increase the capacity of the larger public workforce system to serve older workers and job-seekers. Based on population and labor market projections for many of the states where we operate SCSEP, workers 55 and over will comprise ALL of the net labor force growth in states such as Iowa, Ohio, Pennsylvania, and Wisconsin. To meet the needs of employers as well as older job seekers, we will need a more robust public workforce system that knows how to assess, train, counsel, and assist older persons in addition to youth and displaced workers. We must find a way in which more of the resources of the public workforce system are spent on older workers of all backgrounds and incomes, including SCSEP participants.

Taking into account the sheer numbers of the Baby Boomers and the latest research on pension coverage and attitudes toward retirement, we support stronger coordination and linkage between the existing public workforce system and other public systems such as state and local area agencies on aging, vocational rehabilitation, and the public library system.

SCSEP must remain an essential part of this broader system. Those seniors with multiple barriers to employment will continue to need extra assistance if they are not to be passed over by employers. The current law establishes a specific program performance measure and defines those seniors who are considered “most-in-need.” It would be helpful if Congress would provide additional clarification to the income eligibility guidelines for SCSEP.

We also urge Congress to recognize the value of funding national organizations to continue to be an integral part of the SCSEP delivery system. Working with our local subgrantees and other national SCSEP grantees, Senior Service America has been able to develop several products that are helping to improve SCSEP and other programs for older Americans. Our recent publications and video (“The SCSEP Story: Transforming Lives, Building Communities”) have been well-received by practitioners inside and outside of our subgrantee network. “Giving Back,” a publication about SCSEP in Ohio, and “Engaging Immigrant Seniors in Community Service and Employment

Programs: A Guide for Providers,” complement each other, for together they challenge us to prepare all seniors in poverty (both native- and foreign-born) to be able to contribute to their community.

We are especially grateful to the four oldest minority aging organizations for their assistance in producing our guide on immigrant seniors: the Asociacion Nacional Pro Personas Mayores, the National Asian Pacific Center on Aging, the National Caucus and Center on Black Aged, and the National Indian Council on Aging.

National grantees are also able to establish and maintain partnerships with national organizations to enhance SCSEP as a whole. For example, Senior Service America engaged the Center for Applied Linguistics to co-author the guide on immigrant seniors. We also have engaged the American Society on Aging to develop materials enabling our subgrantees to train SCSEP participants to train their peers on cognitive vitality, brain wellness, and older drivers. We also have worked with the U.S. Chamber of Commerce’s Center for Workforce Preparation to promote partnerships between our SCSEP subgrantees and their local chambers of commerce, as well as individual national corporations such as CVS.

We also work closely with the state SCSEP directors and other national SCSEP grantees in the development of the annual SCSEP state plan and helping to meet equitable distribution goals at the county level. In our opinion, the stronger state SCSEP planning process, which began with the Final SCSEP Rules in April 2004, has improved the partnership and coordination between state and national grantees operating within a state.

As a national grantee, we also provide ongoing training and technical assistance about SCSEP to our subgrantee network. They are thoroughly familiar and in compliance with final SCSEP regulations issued in April 2004 and are reporting all data required by the Labor Department.

Finally, we also demonstrate the value we add as a national SCSEP grantee by bringing in organizations without prior SCSEP experience as subgrantees. For example, recently Jewish Vocational Services in Minneapolis joined our network because they recognized their need as an agency to increase their capacity to serve older workers.

We urge Congress to continue to serve as wise stewards for this program as it has for the last forty years. As you consider possible amendments to SCSEP, please take into consideration all the data available about the program since the 2000 reauthorization. For example, all SCSEP grantees have been collecting and reporting data about participants, host agencies, unsubsidized placements, and other performance measures mandated by the Older Americans Act. We urge a thorough analysis of this data prior to any major restructuring of this program of demonstrated effectiveness.

In addition, all national and state grantees were encouraged to participate in the evaluation currently being conducted by the Government Accountability Office. Also, many grantees participated in an independent national evaluation of SCSEP commissioned by the Labor Department and conducted by DAH Consulting. Each of these separate evaluations should provide a framework for discussing how best to strengthen and improve SCSEP for the future.

In conclusion, we urge Congress to continue its commitment to providing paid community service employment to low-income seniors as one of SCSEP’s dual complementary missions. We also ask Congress to continue to support national grantees as a proven strategy to promote improvement of

SCSEP at the national, state, and local levels. Just as it invests in national organizations to operate a Job Corps program targeted to serve disadvantaged youth, the Labor Department should continue to invest in national organizations to operate the Senior Community Service Employment Program targeted to serve disadvantaged older adults.

Thank you again for this opportunity to participate in this hearing. We will be providing additional testimony to the Committee within the next two weeks.

Submitted by
Anthony R. Sarmiento
Executive Director
Senior Service America Inc.
8403 Colesville Road, Suite 1200
Silver Spring, MD 20910
(301) 578-8469
tsarmiento@ssa-i.org

A Vision for America's Low-Income Senior Workers and Their Communities

The following statement was adopted at a meeting held January 10, 2006, of the 13 national grantees funded by the U.S. Department of Labor.

For forty years, the Senior Community Service Employment Program (SCSEP) has provided part-time employment in a wide range of nonprofit and public agencies to low-income adults 55 and over. Every year, more than 100,000 older adults with poor employment prospects and the greatest need are able to re-enter the labor force. As extra help, SCSEP participants enable thousands of community and faith-based organizations to provide vital public services that would not otherwise be available to other needy seniors, children, and the general public.

The 2000 reauthorization of the Older Americans Act kept SCSEP intact while strengthening program accountability and the role of state governments. Congress concluded that SCSEP is an efficient and cost-effective program, serving practically every county in the nation, including hard-to-serve rural and urban communities.

The 2005 White House Conference on Aging recognized that SCSEP ensures that "the oldest, poorest and least skilled older workers do not fall through the cracks." Across the aging network, there is broad support for continuing SCSEP—with minor refinements—as our nation's most effective workforce program serving the most vulnerable older Americans.

Principles to Guide SCSEP Reauthorization (Title V, Older Americans Act)

1. Target services to older persons with the greatest economic and social need—including those from minority, rural, and urban hard-to-serve communities—by keeping the current age and income eligibility requirements.
2. Maintain and enhance the community service employment aspect of the program in addition to promoting economic self-sufficiency among participating seniors.
3. Maximize expenditures on participant wages and benefits and minimize administrative costs by retaining current policy on program budgets.
4. Support best practice and avoid disruption in the program by continuing to fund both national and state/territorial grants to operate SCSEP.
5. Strengthen the role of the Administration on Aging in SCSEP.

Possible Refinements to SCSEP

1. Amend section 502(e) to remove disincentives for private business concerns, community colleges, and other training providers to participate in innovative training and placement activities for SCSEP participants.
2. Fully implement a "balanced scorecard" to measuring SCSEP grantee performance that reflects Congressional intent, including service level to most-in-need, unsubsidized placement, and community service.
3. Streamline performance data collection.
4. Provide sufficient funds to respond to the projected increase in SCSEP-eligible persons.

This approach would respect Congressional intent in 2000 to update SCSEP without disrupting a proven program has evolved to meet changing needs since its inception. Adopting these principles and refinements will enable SCSEP to serve the most vulnerable and hardest-to-serve older adults in a cost-effective, research-validated, and high-quality manner for the remainder of this decade.

Rationale

1. The number of older adults in poverty and at risk will increase significantly, according to the Census. By 2008 there will be 6.7 million persons aged 55 or over below poverty, a 22% increase from 5.5 million in 2000; by 2015, this number will increase to 9 million low income older Americans. Clearly the need for SCSEP is growing.
2. Current research about productive aging, employment, and civic engagement supports the validity of paid community service employment to assist older adults at risk. Working in bona fide part-time jobs provides not only needed financial aid but also contributes to participants' physical and mental well being, helping them avoid becoming increasingly dependent on others
3. SCSEP does more than help older job seekers find employment—it directly supports the day-to-day operation of thousands of community and faith-based organizations and government agencies. According to USDOL, 70% of these agencies reported that they would not have been able to provide the same level of services without SCSEP. Last year alone, SCSEP participants provided these agencies close to 46 million hours of paid community service. For instance, SCSEP participants and staff work as the primary older worker specialists at many WIA One Stops and have helped meet the increased demand for social services as a result of Hurricane Katrina.
4. SCSEP serves over 100,000 persons 55 and over each year, over twice as many as those served by WIA. Further, SCSEP serves a more needy population: over 70% of all SCSEP participants are women; over 80% are 60 and older; over 80% are at or below poverty, about one-third have less than a high school education; and over 40% are from a minority group. In contrast, WIA nationally serves less than 4,000 persons 65 and over of any income and education level (likely due to performance disincentives currently built into WIA, according to GAO Report 03-350). In PY2004, national and state/territorial SCSEP grantees achieved ACSI customer satisfaction scores that were “substantially higher” than scores for WIA, and better than most organizations in the private sector.
5. The thirteen national grantees (selected by USDOL through a national competition in 2003) add significant value to the total SCSEP program and delivery system. They develop and replicate successful program models by partnering with national-level corporations, employer associations, social service agencies, and other providers. These national nonprofit organizations strengthen SCSEP at the state and local level by sharing best practices on serving hard-to-reach rural and urban communities, including minority and immigrant groups; collaborating with WIA One Stops, area agencies on aging, etc.; and leveraging local resources to support SCSEP. National SCSEP grantees represent unmatched expertise and experience that would be difficult to replace.
6. Since USDOL did not issue final regulations for SCSEP until 2004, many of the initiatives and improvements embodied in the 2000 reauthorization are only starting to take effect. For instance, the reauthorization requires stronger national and state grantee coordination, but the improved state planning process has been in place for only one year. At the request of the Senate Special Committee on Aging, GAO is conducting a review of SCSEP since the 2000 Amendments. It would be premature to make major changes without full implementation of Congressional intent from the last reauthorization in 2000.

Responses from Senior Service America Inc. – June 9, 2006

QUESTIONS FOR SECOND PANEL OF WITNESSES

(Questions for all witnesses on the second panel)

Questions regarding national SCSEP/state SCSEP providers' reactions to DOL's reauthorization proposal

DOL's employment vs. community service focus proposal

- How would changing the current dual focus of SCSEP away from community service and employment to only employment change in focus impact the aging network and other community institutions that have long made constructive use of SCSEP community service placements, such as senior centers, nutrition programs, schools, and health and social service providers?

Response from Senior Service America: The proposed change in program focus would greatly reduce the capacity of many nonprofit and public agencies that provide essential services to older persons and the general community. Combined with cutbacks in funding from local United Ways, foundations, and government, cutbacks in the availability of SCSEP participants may cause some agencies to close down operations.

Since 2003, DOL's increased emphasis on unsubsidized employment and deemphasis on community service may have already led to fewer SCSEP participants being assigned to the host agencies in the aging network by several SCSEP grantees and subgrantees. This may be due to host agencies such as Meals on Wheels, senior nutrition centers, etc. may provide appropriate on-the-job training to SCSEP participants, they rarely have sufficient funding to hire SCSEP participants on their own payrolls. As a result, SCSEP providers may be assigning more participants to agencies that are more likely to hire participants as unsubsidized placements.

- Has there been any analysis of the contributions seniors have made to their community through their placements?

Response from Senior Service America: All SCSEP grantees, both national and state, have been required to report on a quarterly basis to DOL not only the total number of hours of community service employment performed by all SCSEP participants, but a breakdown on the hours in service to the elderly and hours in service to the general community. This data is available from DOL for the current Program Year 2005 and prior Program Year 2004.

For example, from July 2005 through March 2006, Senior Service America's SCSEP participants contributed over 3.8 million hours of community service, with over 1 million in service to the elderly through nutrition programs, seniors centers, and other caregiving assistance.

DOL's age eligibility proposal

- If the DOL age proposal was adopted, how many seniors currently enrolled in your programs would no longer be eligible?

Response from Senior Service America: Over half.

- How would this new age requirement impact the seniors in your programs?

Response from Senior Service America: Many would be left without any alternative source of assistance.

- DoL has stated that under their proposal WIA One-Stops would serve seniors between the ages of 55-64. Do you believe that WIA is currently serving seniors in this age bracket appropriately?

Response from Senior Service America: No. As GAO has pointed out in their testimony about SCSEP to the Senate Special Committee on Aging on April 6th, the existing WIA performance measures represent significant structural disincentives that discourage One Stops from providing WIA intensive services to SCSEP participants and other older workers seeking part-time employment. These disincentives were also documented by GAO study 03-350. As a result, in one recent year the entire national One Stop system served less than 40,000 job seekers 55 and over, from all income and education levels, of which less than 4,000 were 65 and over. WIA performance measures must be revised before WIA will begin to serve seniors appropriately.

Questions regarding national SCSEP/state SCSEP providers reactions to DOL's proposal for re-competition of SCSEP grants this year

DOL's contiguous counties and large grant proposal

- How would this new contiguous county requirement affect your SCSEP program?

Response from Senior Service America: This new requirement poses great challenges for many of our current subgrantees operating SCSEP. For some, the contiguous county requirement will effectively terminate their SCSEP program despite 30 or more years of high performance because legal restrictions or organizational capacity preclude them from expanding their service area to meet the requirement.

Although the grant application submitted by SSAI on May 26, 2006 is for nearly \$89 million for an 11-month period, due to the contiguous county requirement we were not able to include nine longstanding subgrantees in our application, including the City of Austin (TX); Project NOW in Rock Island (IL); Dr. Piper Center for Social Services in Fort Meyers (FL); and the Marion County Commission (WV). Starting next program year, we will no longer be operating any SCSEP program in Florida and West Virginia.

Other subgrantees have been forced to expand their program significantly in order to be eligible to continue their program. For example, the Amarillo Senior Citizens Association has proposed to expand their SCSEP program from serving 2 counties with

51 positions to serving 49 counties with 279 positions in the Texas Panhandle. Another subgrantee, Community Options, now serving 40 authorized slots in San Bernardino (CA), is now committed to serve not only 186 positions in San Bernardino County but also 150 more positions in Riverside County.

- How would a national grantee/or a state assure that this requirement does not create major problems for sponsors proposing to serve targeted populations, which may be concentrated in certain non-contiguous areas within a state, e.g. Hispanic or African-American elderly?

Response from Senior Service America: The contiguous county requirement places all smaller organizations at a great disadvantage in this grant competition. Since the sponsors that specialize in serving targeted populations tend to be smaller organizations, major problems are unavoidable.

Questions regarding the SCSEP provider network

How SCSEP provider network could be used during a public health emergency

- Can you give examples of how the infrastructure you have created with the senior community on the local level could be helpful during a public health emergency?

Response from Senior Service America: Senior Service America operates SCSEP through a network of local networks. Currently, our subgrantees are 108 local government, community-based, and faith-based organizations in 23 states and the District of Columbia. In turn, each of our subgrantees maintains its own network of diverse government, community-based, and faith-based organizations that serve as the “host” agencies where SCSEP participants are working to provide services to their community. Together, Senior Service America and its subgrantees can tap over 2,800 local host agencies and their staffs to assist in a public health emergency.

Additional Questions for Senior Service America Inc.

- 1) I’m concerned about the Department’s proposals surrounding the community service aspect of SCSEP. The Department says it’s not eliminating community service. Do you feel that the Department’s proposals will lead to the elimination of community service in SCSEP?

Response from Senior Service America: The 2000 Amendments to the Older Americans Act (and current regulations) require all SCSEP participants to be assigned to a host agency and employed in community service. Our subgrantees, state SCSEP coordinators, and others have expressed great concern that community service could eventually disappear if

- it is no longer a required activity of all SCSEP participants, and instead becomes optional and just one of several allowable activities for SCSEP participants, and
- “community services provided” becomes a secondary program performance indicator of less consequence than unsubsidized placement and its related indicators.

In addition, HR 5293’s proposal “that not less than 50 percent of hours worked (in the aggregate) shall be in community service employment-based training” could also

drastically cut back community service if 50 percent becomes a ceiling rather than a floor for community service. According to the DOL website (http://www.doleta.gov/Seniors/other_docs/04Highlights.pdf), in PY2004 SCSEP participants worked a total of 46,816,315 hours, of which 45,766,196 hours (or 97%) were spent in community service and 1,050,119 hours in other training. If 50% of the hours worked by SCSEP participants were reassigned to on-the-job training with private, for-profit employers or classroom training activities, the aging network and other social service agencies would lose over 23 million hours of paid staff.

- 2) The last competition for National grantees was in 2003, and the regulations for SCSEP weren't published until 2004. In your opinion, has the Department spent an adequate amount of time evaluating current national grantees to constitute a re-competition? How will the re-competition affect the services you provide to your SCSEP participants?

Response from Senior Service America: We agree with the comments of the GAO in their testimony to the Senate Special Committee on Aging on April 6th. It should be noted that during PY 2003 and PY 2004, the two largest national grantees added during the 2003 grant competition did not achieve the minimum unsubsidized placement goal of 20% currently required by the Older Americans Act. The other two national grantees added in 2003 achieved 20% or more placement rate in PY 2004, probably because each had prior experience operating SCSEP as a subgrantee before becoming a national grantee.

In SSAI's work with new subgrantees, we know that organizations without prior experience operating SCSEP face many challenges and a steep learning curve before they are able to operate SCSEP at an acceptable level.

We are concerned that major changes in national grantees' service areas (which we expect as a result of the new contiguous county requirement) will result in fewer eligible persons being served by the total SCSEP network (including state and national grantees) and significant disruption of services by participating host agencies.

For Panel II

1. I assume you all have seen the Administration's proposal to re-compete the contracts for grantees participating in the Title V program. Do you have any concerns about these proposals and the impact they could have on current and future program participants?

Response from Senior Service America: Implementation of the new contiguous county requirement in the short period of time allowed by the SGA will make disruption of participants and host agencies extremely difficult to avoid. In 2003, the entire SCSEP delivery system (both national and state grantees) served fewer participants than in PY 2002. It's very likely that if there new grantees without prior SCSEP program experience are funded starting August 1, 2006, fewer participants will be served in PY 2006.

We recommend that future grant competitions be designed so that past performance is a major factor in the selection process and that the grants last for five years (assuming satisfactory performance). This approach would support increased accountability and

innovation among grantees, but also establish a stable program delivery structure to minimize disruption to participants and host agencies.

2. I heard a great deal in 1995 about how we need to streamline the job training process. Job training programs were spread over several agencies and were often fragmented at the State and local level. As Ranking Member of the Employment and Workforce Subcommittee of this Committee, I have learned a great deal about job training and Workforce Investment Act programs. But, I do think that older workers are a different challenge and traditional job training or retraining programs are ill equipped to meet the challenges of this population, especially for minorities. The vision or intent of the original Older Americans Act was to fill gaps in safety net programs but also allow older Americans to live with dignity and purpose. Employment training was an important part of this original mission. Can you explain to this Committee why Title V is unique and why it should remain a strong component of the Older Americans Act?

Response from Senior Service America: In 2006, our nation is largely underprepared for the aging of the baby boomers. Like most of our major institutions, the public workforce system has focused primarily on youth and the core working-age population, especially since the funding setaside for older workers ended with JTPA in 1998.

SCSEP is unique and should be continued because it--

1. **has a legislated mission of providing community services, which is not shared by WIA. Meals on Wheels, senior centers, and others in the aging network and other social services depend on SCSEP participants to help them staff their agencies.**
2. **is targeted to serve disadvantaged older adults, including those whom WIA was unable to assist.**
3. **provides income to participants while they are receiving training.**
4. **has funded the largest network of diverse organizations experienced in serving the needs of the older worker and job-seeker.**

Finally, the job placement rates of our subgrantees demonstrate that paid work experience in public and nonprofit agencies (i.e., community service employment or work-based training) is an effective training mode for low-income seniors with multiple barriers to employment. We have found that many of these vulnerable seniors are extremely reluctant to participate in traditional classroom training programs (especially with younger workers) or on-the-job training with private, for-profit employers (which tend to be more demanding). Other types of training can be supplements but are not effective replacements or substitutes for community service employment with SCSEP-eligible persons.