

CALIFORNIA DEPARTMENT OF AGING
Home and Community Living Division

2880 Gateway Oaks Drive, Suite 200
Sacramento, CA 95833
www.aging.ca.gov
TEL 916-419-7500
FAX 916-928-2267
TTY1-800-735-2929

**PROGRAM MEMO**

TO: Title V/Senior Community Service Employment Program Subgrantees

NO: PM 21-25

DATE ISSUED: November 29, 2021

EXPIRES: Until Superseded or Rescinded

PROGRAMS AFFECTED: Title V/Senior Community Service Employment Program (SCSEP)

SUPERSEDES: NA

SUBJECT: Guidance for Returning to In-Person Service Delivery of Title V/SCSEP

Purpose

This Program Memo (PM) provides guidance to the California Department of Aging's (CDA) Title V/SCSEP subgrantees for resuming in-person service delivery following the lifting of statewide COVID-19 restrictions.

Background

On June 15, 2021, the State ended the executive orders that enacted the Stay Home Order and Blueprint for a Safer Economy. This phased out the vast majority of executive actions put in place since March 2020 as part of the pandemic response, leaving a subset of provisions that facilitate the ongoing recovery. (Source: <https://covid19.ca.gov/safely-reopening/#reopeningcalifornia>)

Prior to resuming in-person SCSEP services, based on each county's local ordinances and CDPH Guidance for use of Face Coverings, CDA subgrantees should ensure plans are in place to implement risk reduction measures to ensure the safety of all participants and staff, including:

- Develop a protocol for facial coverings/masks for staff and participants based on each county's local ordinances. To protect their health and safety, subgrantees may require SCSEP participants to wear Personal Protective Equipment (PPE) while performing SCSEP duties in any setting until the policy is no longer warranted. Refer to California Department of Public Health's (CDPH) [Guidance for Use of Face Coverings](#).
- Develop protocols for ensuring PPE, including masks and hand sanitizer or gloves (where hand washing is not available) are available at each SCSEP office and Host Agencies, as feasible.
- Risk reduction measures should be developed and implemented when in-person group programs and activities are resumed, including masking, handwashing, and physical distancing. Participants who have not received vaccinations should be referred to vaccination sites. Vaccine information can be found at [CDPH's COVID-19 website](#).

- Develop and provide staff and participants with COVID-19 risk reduction training. Refer to the [Symptom Screener](#) provided by the Center for Disease Control (CDC). Subgrantees may require participants to complete COVID-19-related trainings prior to resuming in-person service.
- Ensure commitment to adherence to CDC guidelines, including adequate provision of PPE and the use of social distancing in all SCSEP project locations, including Host Agencies. Guidance on PPE and social distancing can be found at [CDPH's COVID-19 website](#).

End of Emergency Paid Sick Leave (EPSL)

Effective January 10, 2022, CDA SCSEP subgrantees will no longer have the option to utilize EPSL for all active participants. All participants must be transitioned off EPSL no later than January 7, 2022. All participants must receive at least a fourteen-day notice of the transition back to in-person activity.

Exclusions for continued EPSL may only be made under the following circumstances for participants that are unable to complete Community Service Assignment (CSA) hours in-person or remotely due to any one of the following reasons:

- The SCSEP participant is subject to a quarantine or isolation period related to COVID-19 exposure (see note below) or is experiencing symptoms of COVID-19 and seeking a medical diagnosis or has an active case of COVID-19 and must isolate.
- The SCSEP participant is the caregiver for a family member who is either subject to a quarantine or isolation period related to COVID-19 (see note below) or has been advised by a healthcare provider to quarantine due to COVID-19, or the participant is the primary caregiver for a child whose school or place of care is closed or unavailable due to COVID-19 on the premises.
- The participant is attending a vaccine appointment or cannot train in-person or remotely due to vaccine-related side effects.

Participants who meet these criteria may receive EPSL until cleared by a medical professional or once the quarantine or isolation period is complete. Participants must provide documentation to validate the need for EPSL. All medical documentation must be kept separately from participant records in a confidential medical file.

If a participant is quarantining or isolating but is able to complete remote work, online training, or at home paper-based training during this time, please elect to use CSA or training hours over EPSL.

NOTE: The quarantine or isolation period related to COVID-19 is the period defined by an order or guidelines of the California Department of Public Health, the CDC, or a local health officer with jurisdiction over the workplace.

Rationale for Transitioning Off of EPSL

By January 10, 2022, CDA subgrantees will resume the provision of CSA and training conducted in-person where feasible and consistent with state and local laws and public health orders.

In January 2021, the U.S. Department of Labor (DOL) posted [COVID-19 Frequently Asked Questions](#) that directly relate to [SCSEP](#). To the question, *“Will the Employment and Training Administration continue to permit SCSEP grantees to use paid sick leave to limit participants’ exposure to COVID-19, while still providing participant wages and benefits?”*, DOL responded that it recognizes that the pandemic represents an ongoing threat to the health and safety of SCSEP participants,

however, SCSEP grantees have had significant time to identify and commit to solutions to address the inability of many participants to be on-site for CSAs or training. At this point, CDA expects grantees to make every effort to move away from a reliance on paid sick leave and actively shift toward the provision of training and CSA conducted remotely or, where feasible and consistent with state and local laws and public health orders, in-person.

Examples of remote activities may include assignments in temporary host agencies and/or online training opportunities. Such activities may also include CSAs performed via remote or telework methods, provided that grantees continue to ensure and promote:

1. Adequate supervision;
2. The development of soft skills;
3. Training aligned to participants' Individual Employment Plans; and
4. Access to any hardware or connectivity necessary for the work assigned.

In delivering in-person services, grantees should determine participant assignments on a case-by-case basis that takes into consideration the risk factors of each participant and ensures adherence to Centers for Disease Control and Prevention guidelines, including adequate provision of personal protective equipment and the use of social distancing.”

<https://www.dol.gov/agencies/eta/coronavirus#SCSEP>

General Guidance

Remote CSAs

CDA will continue to allow participants who have transitioned to remote CSAs to engage in remote training for as long as it is feasible for all parties or until future notice from CDA.

CDA issued SCSEP Remote Assignment Guidance (Appendix A) on January 25, 2021. Sample documents to help organize all required information were also shared. To develop new remote CSAs, please refer to these sources or request technical assistance from CDA.

Temporary Assignments and Alternate Virtual or At Home Paper-Based Training

CDA will allow SCSEP grantees the flexibility to assign participants, including new participants, to temporary Host Agencies on an as needed basis.

Temporary alternate virtual training and/or paper-based trainings, instead of Host Agency assignments, can be provided to participants who meet either of the following criteria:

1. Their former Host Agency has closed and/or no Host Agency options exist at this time.
2. A participant is unable to train in-person at a Host Agency due to an underlying medical condition that increases their risk of severe illness from COVID-19 and the participant provides current documentation from a medical professional as confirmation.

Under these circumstances, the participant and SCSEP staff will jointly develop a training plan that incorporates training that can be completed at home or in another location:

- The training must be in alignment with the participant's Individual Employment Plan (IEP).
- This training can include obtaining a credential or certification, community college course, GED/ESL course, ServSafe, and other specialized trainings.
- A participant who is approaching their Individual Durational Limit (IDL) or is considered job-ready may conduct intensive job search and must provide verification of job search and application activities.
- The participant can be assigned to the SCSEP project as the Host Agency (assignment must also be entered in SPARQ).
- Timesheets must be completed with the training hours included and the hours must be verified by SCSEP staff or a designated person at the training location.
- Documented case notes and the IEP need to include information about this training.
- At home paper-based training may be appropriate and provided in rare circumstances where remote training using technology is not feasible and the project is able to provide written materials that can be used to participate in training at home. The materials can be mailed to the participant, or the participant can opt to pick up and drop off work using following the SCSEP Recertification Document Collection Guidance (Appendix A) issued February 18, 2021.

The length of time a participant may continue in temporary assignments or be provided virtual and at home paper-based trainings will be reviewed by SCSEP staff each pay period. Subgrantees implementing temporary or alternative assignments must ensure that participants are served equitably.

Combination of In-Person CSA Hours and Virtual or At Home Paper-based Training

SCSEP is best equipped to provide on-site CSAs, and this is the preferred method of service provision. However, if a Host Agency has reopened but is temporarily unable to satisfy the full number of hours of participant training and supervision per week, the participant can temporarily engage in at home training assignments to make up the difference.

Host Agency Partnership Reengagement and Recruitment

Host Agency Reengagement Priority

The health, safety, and financial security of our participants are priorities of CDA during the evolving situation with COVID-19. As states reopen, nonprofits are reopening. In preparation for resuming in-person service, previous Host Agencies must be contacted to discern their ability to provide safe and supervised training, the types of training that will be provided, and the proposed start date of the training. Subgrantees can develop a new form or use the provided SCSEP Host Agency Reopening Assessment Form SAMPLE (Appendix B) to determine whether criteria for resuming in-person activity have been met and the participant may return to the Host Agency. Subgrantees may also choose to implement additional safety protocol agreements to be signed by Host Agency staff. Projects can develop a new form, modify their existing Partner Agreements, or use the provided SCSEP Host Agency Safety Protocol Checklist SAMPLE (Appendix B).

Host Agency Recruitment

COVID-19 has resulted in adverse impacts for many SCSEP Host Agencies. SCSEP projects should target new Host Agencies using their knowledge of the area and organizations, reputations in the community, and the quality of an organization's training and supervision. SCSEP staff should network within the community to identify potential new Host Agencies and utilize other resources such as community directories, social service organizations, and internet sites that provide listings of community governmental agencies and nonprofits.

During the transition to in-person SCSEP services, temporary remote accommodations are permitted, such as:

- Virtual reassessments and recertifications for active participants, when feasible.
- Virtual enrollment activities for new participants, when feasible.

Authorized Breaks in Participation and Termination

Leading up to the transition back to in-person CSAs, all SCSEP participants are required to:

- Remain in contact (bi-weekly or more frequent) with SCSEP staff.
- Participate in case management activities, including reassessments, IEP updates and recertifications.

If a participant fails to comply with these requirements, they should be placed on an unpaid administrative Authorized Break in Participation and a determination made that termination criteria have been met following the [CDA Termination Policy](#) (Appendix C).

Once all CDA SCSEP subgrantees transition back to in-person service provision on January 10, 2022, CDA will allow grantees the flexibility to place participants on a voluntary Authorized Break in Participation if they are not ready to resume in-person training for health reasons. This unpaid break in service can last for 60 days, with the possibility of an additional 30-day extension, upon request to CDA. All subgrantees must follow the [CDA Approved Break in Participation Policy](#) (Appendix C). If the participant refuses to return at the end of the Authorized Break in Participation, they may be terminated from SCSEP following the CDA Participant Termination Policy.

Subgrantees should keep in mind that temporary alternate at home training options are permissible at this time. If a participant refuses to return to their Host Agency due to health concerns, the project should:

- Attempt to reassign the participant to a new Host Agency.
 - The participant can be provided with alternate virtual or at home paper-based training while the reassignment takes place.
 - If it is not feasible for the project to coordinate virtual or at home paper-based training, the participant can be placed on an Administrative Break in Participation (without pay) while a new Host Agency is secured.

If the participant refuses to resume in-person training for medical reasons, regardless of the Host Agency placement, the participant may elect to voluntarily exit the SCSEP. Time left on their durational limit will remain and they can be encouraged to attempt to re-enroll in the future, permitting the subgrantee does not have a policy against reenrollment and dependent on whether vacancies exist at the time they wish to reenroll.

Subgrantees may require participants who agree to return to in-person training to sign new documentation. The project can choose to develop their own forms, or use [Participant Return to In-Person Assignment Form SAMPLE](#) (Appendix B).

In all circumstances, SCSEP project staff must remember that SCSEP is a person-centered program and must implement the policy equitably to all participants.

Appendices

Appendix A: SCSEP Remote Assignment and Recertification Guidance

Appendix B: SCSEP Host Agency Reopening Guidance Sample Forms

Appendix C: CDA Title V/SCSEP Termination and Approved Break in Participation Policies

Inquiries

For Title V/SCSEP inquiries, email: TitleV.SCSEPUnit@aging.ca.gov.

/Sutep Laohavanich/

Sutep Laohavanich, Deputy Director
California Department of Aging