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**SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM**

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**State Project/Program:** **SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM  
TITLE V**

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**U. S. DEPARTMENT OF LABOR  
EMPLOYMENT AND TRAINING ADMINISTRATION**

**Federal Authorization:** Older Americans Act of 1965, Title V, as amended, Public Law 109-365, 102 Stat. 2522; 42 U.S.C. 3001 note.

**N. C. Department of Health and Human Services  
Division of Aging and Adult Services**

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**N. C. DHHS Confirmation Reports:**

SFY 2019 audit confirmation reports for payments made to Counties, Local Management Entities (LMEs), Boards of Education, Councils of Government, District Health Departments and NC DHHS/Division of Health Service Regulation Grant Sub recipients will be available by mid-October at the following web address: <https://www.ncdhhs.gov/about/administrative-offices/office-controller/audit-confirmation-reports>. At this site, click on the link entitled “Audit Confirmation Reports (State Fiscal Year 2018-2019)”. Additionally, audit confirmation reports for Nongovernmental entities receiving financial assistance from the NC DHHS are found at the same website except select “Non-Governmental Audit Confirmation Reports (State Fiscal Years 2017-2019)”.

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The Auditor should not consider the Supplement to be “safe harbor” for identifying audit procedures to apply in a particular engagement, but the Auditor should be prepared to justify departures from the suggested procedures. The Auditor can consider the Supplement a “safe harbor” for identification of compliance requirements to be tested if the Auditor performs reasonable procedures to ensure that the requirements in the Supplement are current. The grantor agency may elect to review audit working papers to determine that audit tests are adequate.

This compliance supplement should be used in conjunction with the OMB 2019 Compliance Supplement which will be issued in the summer. This includes “Part 3 - Compliance Requirements,” for the types that apply, “Part 6 - Internal Control,” and “Part 4 - Agency Program” requirements if the Agency issued guidance for a specific program. The OMB Compliance Supplement is Section A of the State Compliance Supplement.

**GENERAL INTRODUCTION**

The North Carolina Division of Aging and Adult Services (DAAS) is the State Unit on Aging (SUA) as referenced in the Older Americans Act of 1965 as reauthorized October 17, 2006. The Division administers funding under Titles III, V, and VII of the Older Americans Act as well as a variety of other funds both Federal and State in nature.

Title V of the Older Americans Act, as amended, (P.L. 109-365), authorizes funding to place persons 55 and older who are economically disadvantaged into useful part-time community service programs while helping them transition into unsubsidized employment. In addition to employment training, participants receive counseling, and other supportive services to assist in the transition to unsubsidized employment.

The mission of the DAAS is to promote independence and enhance the dignity of North Carolina's older adults, persons with disabilities, and their families through a community-based system of opportunities, services, benefits, and protections; to ready most in need older adults to enjoy their later years; promote economic self-sufficiency; improve quality of life and to help society and government plan and prepare for the changing demographics.

Through partnering with our fellow DHHS divisions and offices as well as with Area Agencies on Aging, County Departments of Social Services, County Departments and Councils on Aging, other local services and programs for older adults, persons with disabilities, senior leaders, and other public and private interests, the Division plans, administers, coordinates, and evaluates a community-based system of opportunities, services, benefits, and protections to advance the social, health, and economic well-being of seniors and persons with disabilities and their families.

### **I. PROGRAM OBJECTIVE**

The objective of the Senior Community Service Employment program (SCSEP) is to provide, foster, and promote useful part-time work opportunities in community service activities for low-income persons who are 55 years old or older. The SCSEP fosters individual economic self-sufficiency, promotes meaningful community service and increases the number of persons most-in-need who may benefit from future unsubsidized employment.

### **II. PROGRAM PROCEDURES**

The U. S. Department of Labor grants Title V funding in North Carolina to the Division of Aging and Adult Services and three national contractors.

Funds are received by State Units on Aging and allocated to local governments, public and private nonprofit organizations, based on the submission and approval of a Request for Application, to create and pay for part-time community service positions at established local service agencies or newly formed or innovative community service projects. Agencies receiving these funds are called “sub grantees.” Participants are assigned a training site location. The “training site” or host agency may, or may not be part of the sub-grantee’s operation.

The Title V Coordinator monitors the various training sites to insure appropriate program operations. In local workforce investment areas where more than one grantee under this title provides services, the grantees shall coordinate their activities related to the NC Works Career Center and grantees shall be signatories of the memorandum of understanding (section 121c, Workforce Investment Act, 1998).

### **III. COMPLIANCE REQUIREMENTS**

In developing the audit procedures for testing the compliance requirements of Aging programs, auditors should refer to the matrix to identify which of the 12 Compliance Requirements (Part 3 of OMB Uniform Guidance 2 CFR part 200 compliance supplement) are applicable. In addition to the general requirements found on the matrix, the following compliance requirements also apply.

### **A. ACTIVITIES ALLOWED OR UNALLOWED**

Training, counseling, and other supportive services may be provided by the sub-grantee or host agency after developing an Individual Employment Plan with the participant. SCSEP participants shall be provided the opportunity of paid training between 18-21 hours per week at a training site (host agency).

### **B. ALLOWABLE COSTS/COST PRINCIPLES**

Local agencies are required to follow Office of Management and Budget, Title 2 Code of Federal Regulations, Chapter I, Chapter II, Part 200 (Uniform Guidance) Subpart E.

### **E. ELIGIBILITY**

All participants must be 55 years old or older, unemployed, residents of North Carolina at the time of enrollment and with an annual income no greater than 125 percent of poverty as defined by the U. S. Department of Health and Human Services. A copy of the current guidelines can be found at [http://www.doleta.gov/Seniors/html\\_docs/TEGL.cfm](http://www.doleta.gov/Seniors/html_docs/TEGL.cfm). Poverty Guidelines are issued annually and are also available through the Division.

### **G. MATCHING, LEVEL OF EFFORT, EARMARKING**

Total costs of the Title V Program may be reimbursed up to a maximum of 90% of those costs. The remaining 10% of those costs must be borne by the grantee agency, sub grantee or host agency in the form of non-federal in-kind match. (OAA Sec. 502) (20 CFR Part 641 and 29 CFR Parts 89)

### **H. PERIOD OF PERFORMANCE**

The Division issues a contract to the sub-grantee. The sub-grantee signs off on the contract and programmatic assurances committing to meeting the programmatic and financial obligations of the grant. All agreements are based on the State Fiscal Year (July-June).

### **L. REPORTING**

Each sub grantee submits a SCSEP *Quarterly Progress Report* to capture data elements during the reporting period into the SCSEP Data Collection System. BCT Partners is the Department of Labor's database contractor. In addition, sub-grantees will submit a narrative progress report quarterly to the State SCSEP Coordinator. The database provides demographic and performance data which is evaluated to determine that the objectives of the program are being met. No testing is required by the local auditor. A Reimbursement Request from the lead regional organization is submitted to the SCSEP Coordinator no later than the 15th day of each month to receive reimbursement of funds. The Controller's Office makes payment to the lead regional organization, who, in turn, reimburses the host agency or individual program participant.

### **M. SUBRECIPIENT MONITORING**

Title V funds may not be sub-contracted by a sub-grantee.