**WorkforceGPS**

**Transcript of Webinar**

**SCSEP: Let's Get Ready to Transfer**

**Thursday, December 1, 2016**

*Transcript by*

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LAURA CASERTANO: (In progress) – questions or comments at any time. Now, I'd like to turn things over to our moderator today, Michi McNeace. She is part of the SCSEP team. Michi?

MICHI MCNEACE: Thank you, Jen, and welcome, everyone. As Jen mentioned, thank you for coming to our transition three. What we would like to call it today is let's get ready to transfer. Our objective today is to provide you guys with a SCSEP update from the Department of Labor's perspective and then talk about meeting those critical deadlines. In addition to that, we were going to have some grantee status updates, and then at that point in time I believe we will be talking specifically to our new grantees.

So our guest speaker today is – we have Judith Gilbert, Bennett Pudlin, and Terry Cram, and then we also have guest speakers that will be speaking later on in the webinar. That will be three of our grantees, which is – our first speaker will be Ms. Lee from the National Asian Pacific Center on Aging, Ms. Wilkins from the National ABLE Network, and Ms. Odom from Easter Seals. So with that being said, I'm going to go ahead and let us get started and pass this on to Judith Gilbert.

JUDITH GILBERT: Thank you so much. I think we're at the time when it's getting to be crunch time for all of us in this very complex and rigorous transition process. So we're going to provide you with as much information as we can, answering a number of questions that we've gotten.

So the first thing I want to do in terms of the DOL update is there are three items on that list, transition funds, transfers and over-enrollment, and transfer and swap report I'm going to handle the first one, and then I will turn it over to Bennett and Terry to pick up on the transfers and over-enrollment and swaps and etc., etc. So let's go to the next slide about transition funds.

There are basically two kinds of transition funds that we want to be talking about, the regular admin costs in your regular budget and any additional transition funds that we may be able to give you. So let's talk about the current funds that you have, if you're a – if a current grantee or new grantee that has funds that technically the period of performance is – doesn't start until February 1st.

In all cases, whether you're current and you have your notice of award for January and February through June or a new grantee that your notice of award said I think November 15th through June 30th, you can spend admin portion of those funds now. They are not state-specific because admin costs in this program are not necessarily tied to any individual state. What you cannot spend now is PWFB, participant wages and fringe benefits, and other programmatic costs.

So the important thing to look at for admin costs is, what functions and activities equal admin costs? And the answer is in the regs in section 641.856. So I would encourage you to get, if you're not already, extremely familiar with that section, and it is actually quite broad. So if there are particular questions as to whether or not something is an admin cost versus a programmatic cost, I think that we have answers for that, and we can help address that.

When can admin costs be incurred? And this is in your regular grant money that you have, and the answer is now. However, you only have at this point 13.5 percent for the entire year or the period that you have the money for the newbies. We call you newbies here. I hope you understand what you mean – that there is a limit. However, you can request the admin cost limit to be increased to 15 percent, and you may have more admin costs because transition has more admin-related expenses than ordinarily.

We would urge you to, as you're submitting your documents, to request the increase. There are criteria that we actually sent out to you yesterday. Most of you would have already had it anyway but from the statute and from the regs as to what justifies a reasonable rationale for increasing the cost. It doesn't cost you anything to ask for the increase. We're not suggesting that you spend 15 percent on admin, but it just covers you just in case you find that you need to. And if you don't and you stay at 13 percent or 12 percent or whatever the number is, that's perfectly fine.

So in terms of the materials that the grant office has requested, the grant officer has decided that any additional requests that have been asked, including the admin cost one, up until now, none of those requests are going to carry over. So my advice to you is seriously consider requesting the admin cost increase to 15 percent for the February through June period.

What that will mean is that once it's granted, and the likelihood because your rationale should be pretty simple, is that it will apply to the entire year. For current grantees, you have one grant and there's one closeout and so when the admin cost cap is looked at, it is at the end of the year and so it will include all the money that you've got from July 1 through June 30th, all of PY '16 money. I'm looking around the room. Does that seem clear? OK.

Let's talk briefly about the additional transition funds that we sent you out a form to submit a request to us. We're looking at these now. We don't quite have all of them in. We're expecting just a couple more, but I will tell you that – what our process is here. We have to look at whether or not the – what you requested, it meets the definition of an admin cost – and as I said, that's very broad and I'll get specific in a minute – whether it's reasonable and appropriate. And what we're seeing so far are, of the requests we've gotten in so far, it is two and a half to three times as much money as we have.

And we said to you from the beginning that this money was limited because it's basically recapture funds and, as I said I think on the first call, you guys have done so well in the last couple of years of spending all of your money each year, which is what we want you – we and the Congress wants you to do. So we don't have as much recapture money as we might have had previous years.

So what we're having to review is making sure that when we look at across all of you, that there's some comparability, that there's some fairness, that everyone is being treated the same. And there are several of us that are reviewing these and talking to each other about it and coming up to some consensus. A couple of things that we're seeing are requests for travel money, which we would expect to see because you're doing all of these wonderful transition meetings, whether you're a donor grantee or a receiving grantee.

But with a number of them there's not much specificity. An overall number that says travel doesn't really tell us much. You ought to be able to at least do some broad estimates of how many trips are we talking about and what's an average kind of cost. I mean, some of you clearly are traveling long distances and that's makes a difference and you have to stay overnight versus others of you, your travel may be fairly local and so it doesn't need to be hotels and all of that. So just you going to need to be more specific.

So what I'm requesting that you do now is that you go back and look at what it is you've already sent to us and see if you've been as specific as would be helpful to us to make a judgment, about travel in particular, also salaries item. Anything else, Irene, in particular that we – that – I mean, rent and computers and those kind of things, those we have – we can easily enough hopefully figure that out or – but what we're going to do is we are also going to be getting back in touch with those of you whose – in particular whose information is not specific enough.

MS. : We're seeing a lot of other costs.

MS. GILBERT: Other costs that are not specified. So you need to be focusing on 856, but I will point out to you on item nine, other activities necessary for the general administration of government funds and associated programs, it – oh, just below that there's an item four that says travel costs incurred for official business in carrying out administrative activities or the overall management of the program.

And the transition that you are undergoing now is part of the overall management of the program that is unique to this period of time. So that it's the specificity that we're needing, especially when we – when I told you that what you've requested so far is almost three times what we have. So we just really working very, very hard to make a fair and equitable determination as quickly as possible. So looking at what you've sent us, you certainly may send us an amended one. That would be wonderful, or we will be getting back to you as need be.

Just to back up ever so slightly, when I talked about the admin costs that you can spend now from your regular – the funds that you've been appropriated in the NOA from the grant office, what you cannot spend now is specific participant wages and fringe benefits until that specific period of performance. But there's no reason for you to want to spend that now because the participants that you're going to get – the participants that you have that – until they're transferred, they're your responsibility and you pay them until February 1st.

And if you're getting participants as the recipient grantee, you're not responsible for them until February 1st. So you don't need to be spending any money on them specifically. But as I said, transition meetings are considered a reasonable transition cost, which is an admin cost. OK. If you can send in any amended requests by the end of the day tomorrow, that would be extremely helpful because we're wanting to get all of these analyzed and finalized so that we can tell you how much money we're going to be able to give you. So that's in your interest to help us out here and make sure that we have all of the information that we need.

I think that covers the transition funds, both the regular money and the additional transition funds possibility. So now, I want to turn it over to Bennett and Terry for the next slide about transfers and over-enrollment.

BENNETT PUDLIN: Good afternoon, everyone. I'm sure you're glad, as we are, that we are really getting into the home stretch. If we could advance the slides, please. OK. Someone's going to have to tell me – I'm not seeing slide nine. Is it up yet?

MS. : I see slide 11 – there's 10. There's 9.

MS. : We are on slide nine right now.

MR. PUDLIN: OK. Just showed up. Thank you. So we've been getting a lot of – I shouldn't say a lot. We've gotten several questions, predominantly from state grantees but also from national grantees about impact of the transfers on both equitable distribution and their budgets. And there seems to be some confusion about the role of enrollments and the difference between them and authorized positions. Your grants are set based on the number of authorized positions that you've been awarded.

For the state grantees, those numbers were known and were built into the PY '16 grant awards. At that time the awards were based on the PY '15 equitable distribution, but the total number of positions for state grantees did not change between PY '15 and PY '16. There was some change within counties. In some cases the number of positions within a county changed. In a few situations states gained or lost counties, but the total number of positions in the state remain the same. So the dollar amount of the state grantee awards for PY '16 remains exactly as it was on July 1st.

For national grantees, in the aggregate the total number of national grantee slots nationwide is the same in PY '16 as it was in PY '15, but obviously, for individual grantees there's – can be tremendous variation between the '15 and '16 number of authorized positions and thus the amount of the award. And that's why you're going to be getting additional money in February that reflects for the balance of the year the number of positions you've been awarded in the competition.

What happens is, though, that all participants who are in counties that are changing hands due to the competition or due to the delayed implementation of equitable distribution for PY '16, all of those affected participants have to be moved to the appropriate grantee, to the grantee that is authorized to serve that county as of February 1st. And for the most part, that doesn't cause any issues, but there are instances where grantees are receiving far more participants than they expected, far more participants than their authorized positions in the county. And that's because a combination of things.

In some cases it's because the number of positions in the county has gone down from PY '15 to PY '16 due to census changes. In other instances it's due to the fact that the donor grantee was over-enrolled, or it may be that the county is changing from national to state or vice versa and – in whole or in part and the result is that the recipient winds up with more participants than authorized positions. And there's no cause for concern.

First of all, it has no impact on budgets for anybody. Your budget is based solely on authorized positions, and while you may wind up with enrollments in excess, even far in excess of what equitable distribution calls for, you are not expected to do anything dramatic to rectify that situation. All that's required is that you take reasonable steps over time to bring your numbers in alignment with equitable distribution.

Where you are the recipient grantee and find yourself in extreme variance from equitable distribution because of the transition, you'll have an opportunity when you do the ED report to explain that to DOL, and you'll not be held responsible for that. And DOL understands that, depending on the magnitude of the over-enrollment in the county, it may take a while to get those numbers down.

The usual approach to addressing over-enrollment of course is to stop new enrollments as soon as you become aware of the problem. And so that's a first step that recipient grantees should be taking now, if they are aware that they're going to be receiving more grantees than they can handle in a county. So they stop enrollment in that county. The next thing to do is to look at increasing exits for unsubsidized employment, putting a priority on placement activities in order to reduce participant count.

In cases where there's a concern that the over-enrollment in a given county or in multiple counties is going to put pressure on the grant budget overall, grantees can and should seek to balance over-enrollment in one county with under-enrollment in another, and it may call for freezing enrollment across the whole grant for a period of time until the total number of enrollments for the grant gets down to a manageable level. And again, increasing exits for unsubsidized employment anywhere in the grant will lower the participant count and reduce expenditures, even if that doesn't occur in individual counties that are over-enrolled.

Finally, if the grant-wide over-enrollment is so extreme that neither of these two measures is going to be adequate, then it's important that the grantee make a decision as early as possible about the need to reduce hours slightly. If there is a careful reduction in hours early, it can avoid more drastic action later, if the situation doesn't get under control as expected. And if, in fact, you're able to manage your way through sooner than you anticipated and you wound up reducing hours more than needed, you'd still have time to increase hours to make up for that reduction.

So the normal rules that you've been operating under for decades would apply. The department will be very supportive and understanding for those of you who wind up over-enrolled due to the transition, and we're happy to work with you on strategies to manage down, if you need help. So I think with that I'm going to turn it over to Terry for her update on where we stand with transfers.

TERRY CRAM: Hi, everybody. So I want to thank everybody again for responding to the version one list, and most of you have been working with Baron, who's collected all of your responses. We are putting those responses into the next version that we're going to put out. I'll talk about that in a moment. I do want to mention first, though, that the version 1A list that we sent last Friday, strictly for informational purposes.

We included host agency information and also some dates like the date of recertification and last IEP and the last physical. That's totally for your information. We are going to include that information also in the next version, version two. So then when you respond to that, if you have any questions on version two, then certainly you would come back to us for that.

We are working on a new report of all counties that will list every single county in the country, whether it's involved in transition or not. It will be a handy-dandy reference that you can come to it, see which grantees are authorized to serve, what their slots are. It will be a nice resource going forward, and we'll be getting that out to you shortly after the version two list goes.

Now, to talk about version two, which we will get to you by tomorrow, that is going to have all of the enrollments as of yesterday. So anyone who's exited since 10/18 until yesterday will drop off that list. As I mentioned, it will have all of the information that you provided on the first version of the list. It will also include updated – the county changes due to swaps.

So all of the slot changes that were made when the grantees did swaps will all be reflected there, and we will indicate – we're going to have a column that will indicate if a participant's affected by a swap, so they had previously been supposed to go to one grantee but now they're going to go to a different grantee. We're going to give you a key for that.

Again, we are going to also include the host agency and those dates in the version two list, and we will need your feedback on that list by December 15th. It will come with complete instructions. Your choices will be the same that we gave you on the version one list. Hopefully, for the most part, your choices are not going to have to change.

It will just be a matter of pretty much just selecting the same thing you did last, but if there are anything that changed since then or if there are new – there will be a handful of new records, enrollments that hadn't gotten entered into SPARQ as of 10/18 will appear on this list. This will be your chance to enter that.

The next version three we're going to work on during Christmas week, and so you will have that when you come back from your Christmas holiday. If you're on vacation that week, you'll get it first week in the new year. Bennett, did you want to say anything else about the lists?

MR. PUDLIN: No. I think that does it. Thank you.

MS. CRAM: OK.

MR. PUDLIN: If we can go to the next slide, yeah. Before – a brief update on a couple of other issues. A question did come in about the ability to reduce hours if the grant is over-enrolled in general, not just in a particular county. And the answer is, yes. If you recall, in one of the earlier transition calls we did talk about rights of participants who are being transferred due to the competition.

And we said at that time, as we've always said, that grantees were entitled to remain at their host agency in their current position with their current hours and rate of pay. But we did also note an exception, as we have done in prior transitions, that if the grantee is substantially over-enrolled and less drastic measures are not expected to be adequate to bring enrollment down to budgeted levels by the end of the year and the grantee has to reduce hours uniformly, the hours of the transferred participants can also be reduced. You can't single them out and you can't do it just in a county. It's got to be based on the total grant condition, but if things are that bad, then the transferred participants will have to share in the pain.

So I did want to – oh, there's also a note about whether version two is going to contain host agency and participant addresses and first names. We did get that request. Unfortunately, too late to accommodate in version two, but we are hopeful that once we get all of the required reports out the door – and we've got a bunch to do for the grants officer and for you all, actually – we will do a version 2A which will contain the additional contact information so that you can use the transfer list for mailing or uploading other purposes.

I just really briefly wanted to give you an update on the position swaps. You all were fantastic about getting your requests in by the deadline, and DOL met its commitment to make final decisions on time. In total we had seven what we identify as separate requests involving 48 counties in six states, 12 grantees, a total of 479 positions counting both donor and recipient, so half of that if you're just looking at sort of one-way swaps. Most of them were one-to-one swaps.

A couple were more elaborate and were three-way swaps, and just want to thank the grantees who worked on these. In some cases we had to come back to you repeatedly because of technical issues, and you got very creative and engaged your state grantee partners in getting into the swap with you to make the numbers work. And it was totally successful, but I know it was also very painful to get there. So our great thanks to everyone who contributed to that. As Terry said, we're incorporating the swaps into all of our lists going forward. So they will reflect your final award.

And speaking of that, one of the products that we're working on creating and we'll get out to you sometime next week is a revised list of all the counties that you are receiving as part of your award or, if you're a state grantee, as a result of the swaps. And that will also be provided to the grant officer. You can use that in your submission, when you have to submit the territories that you're serving, and the grant officer will be using it for modification of your award as well.

MS. GILBERT: And that allows me to give them another piece of really good news, and that is that several of the grantees have requested, if they were doing swaps, could they wait to submit their documents to the grant office and incorporate the swaps so that they would only have to do one modification.

And the answer is yes. I confirmed with the grant officer yesterday that, if you need a little bit of additional time, particularly those who are incorporating swaps in terms of returning the materials by the 30 days after the NOA, that the grant officer is open to that. And so you are free to take a reasonable amount of time slightly beyond 30 days, not 40 or 50 or 60 but just a few days more in order to make sure that you'd only do it once. Anything else – (inaudible).

MR. PUDLIN: Well, that is great. Yeah. Just real quickly, a reminder that the freeze on enrollments remains in effect. Version two going out has a column that indicates which grantees are affected by the freeze in each county. Transfers – discretionary transfers are also still on hold until February 1st. Swaps are over. We know that there may be circumstances that will cause you to think of additional swaps you'd like to make, but those are going to have to wait until after the transition – the transfers occur on February 1st and then you can follow the normal procedure and submit your requests at any time thereafter.

And just one last thing, data validation, there was some confusion about the discussion on the last call that we wanted to clarify. As we reported then, the program that draws the sample does not include any transferred records of either donor or participant. They're excluded from the sample. However, the data validation that you're doing now in PY '16 involves records from PY '14 and PY '15 prior to the completion, obviously prior to these new awards, and the donor grantee was solely responsible for those records at the time they were created.

And those are, of course, included in the PY '16 data validation samples that we drew back at the beginning of November. The transfers that are occurring now or on February 1st as a result of the competition, those records will not be included in next year's data validation when we draw that sample 11 months from now.

So we apologize for any confusion. There is ample time. I think as we said on the last call, data validation normally is limited to six months. The period was extended by another almost two months so it runs through the end of PY '16. It was designed to ensure that grantees had ample time to get it done with everything else that's on the plate.

For those of you that are concerned about the ability to access records efficiently where subgrantees are shutting down, it would be prudent, obviously, to do those records now – to obtain those records, at the very least arrange for their copying and transfer. And again, just to repeat, you need to make arrangements for the preservation of those records anyway because you as a grantee remain solely responsible for their retention and producing them if needed. So it would be a wise thing to get a handle on that now well in advance of February 1st.

MS. CRAM: Hi. This is Terry. I do want to personally apologize for misleading last call because it's all a matter of perspective when we're talking about next year. I'm already thinking about next year, and I didn't – I was totally thinking about the PY '17 validation and not realizing the question was about the PY '16 validation. So I'm sorry for that.

MS. GILBERT: Michi.

MS. MCNEACE: OK. Bennett, are we done?

MR. PUDLIN: We're done. Thank you.

MS. MCNEACE: OK. Well, thank you both, Bennett and Terry. So we've had a few questions that have come through. So we're going to go ahead – before we talk about critical deadlines, we're going to go ahead and open it up for questions and answers. So we are able to either take your questions either via the chat or, if you care to verbalize your question, please hit \*6 on your phone to unmute it and tell us your question.

MR. PUDLIN: We have one – Michi, we have one that's come in as you're speaking that relates to over-enrollment. If we can –

MS. MCNEACE: Go ahead. Answer that one.

MR. PUDLIN: Yeah. The question is, "If the enrollment freeze is used to reduce high over-enrollment, will the impact be reflected in determining the service level at the end of the program year?"

Well, yes, because the service level counts the number of people you serve. However, the important thing to note is that there's no difference between a newly enrolled participant and a transferred participant at the grantee level when determining service level. Each one gives you the same count on the service level, and if you are over-enrolled because of transfers, every one of those transfers has boosted your service level. So yes. You won't continue to increase your service level if you stop enrolling after February 1st, but you're going to have a dramatic increase in it based on the over-enrollment that occurs through transfers.

MS. MCNEACE: OK. Thank you, Bennett: We have our next question. It says, "Since admin funds are available now for the February 1 through June 30th period, when we draw, do we note we are drawing only admin, or do we just draw against that" –

MS. CASERTANO: Terry, are you still there? Michi, are you on the line?

MS. CRAM: I'm here. I can't hear Michi.

MS. CASERTANO: I cannot hear Michi either. Well, does someone want to take this question?

MR. PUDLIN: I think that's going to be an answer that's got to come from the grants people. I don't know if we have the grants office or Irene on the call. So if not and we don't get Judith or Michi back soon, this will be something that we will get an answer to and notify everyone of.

I don't know if Michi can hear us, but if so, probably she needs to –

MS. CASERTANO: It looks like she's dialing back in.

MR. PUDLIN: OK. Good. In the meantime, do we have other questions not grant-fund related? Yes. "Once transition funding requests are resubmitted, is there a target date for notification and disbursement?"

As soon as possible, I'm told. They're working on the review now, which is why they know that some of you need to submit revisions. You've been encouraged to do that right away. I'm sure you will hear from the national office if they have specific concerns about some of your requested items, but there is no firm date. They've got an awful lot to review and evaluate before they can figure out how to allocate the available dollars.

MS. MCNEACE: Thank you, Bennett. Can you hear us now?

MR. PUDLIN: You're back. Yes. Hi.

MS. MCNEACE: We're back.

MS. GILBERT: We're back. (Inaudible). You've been vamping there while we – (inaudible) – we were off line.

MS. MCNEACE: Thank you for taking control. So were you able to answer the question or –

MS. GILBERT: Let's just –

MR. PUDLIN: Well, the only – we didn't – we answered everything except for the one about drawing down their admin early and how do they designate that when they do it.

MS. GILBERT: OK. To the best of our knowledge, when you draw down money, you don't specify what it's for. You just have to be sure that you're doing it for admin and at the end of the year that you can justify your admin costs.

And the other point about the resubmission for your transition funding is we're not necessarily encouraging you to do that, but if you want to, we want you to do it by – hopefully by tomorrow because the sooner you can get them in to us and we can clarify, we're going to be able to make the determination. And no. They are not considered part of the – those additional transition costs are not subject to the 75 percent and the 13.5 percent admin cost cap. They're calculated separately. OK.

MS. MCNEACE: Great. Thank you. So from our understanding on this side, we do apologize. We again had a little bit of a glitch but we're back and we understand that all the questions were answered or –

MS. GILBERT: We might have another one.

MS. MCNEACE: Correct, Bennett?

MS. GILBERT: Well, I see a question about, "When will we have access to SPARQ?" And that is clearly a new grantee question, I'm assuming. The answer is as soon as all of the documents are in to the grant office and approved, that's when you become an official grantee. And then we will notify you about what you need to do to get SPARQ access. OK. Let's move along because I think we're running behind here.

MS. MCNEACE: Well, before we move along, we do have one that says, "Can you talk a little more about training waiver options for the current grantees, specific in regards to the 90-day implementation?" We will – we can talk about that offline with you at this point in time.

MS. GILBERT: There is a specific time period that is required before it can take into effect.

MS. MCNEACE: Yeah. Exactly.

MS. GILBERT: So we will talk about – to you offline about that.

MS. MCNEACE: And if you're – the person who asked the question, if you're a new grantee, there is a new grantee segment at the end of this webinar. So we might be able to give you a little bit more information during that time period.

MS. GILBERT: OK.

MS. MCNEACE: OK. So we're going to go ahead and move on. We're going to go about – and we're going to go talk about meeting critical deadlines, and that would be Judith.

MS. GILBERT: OK. I think I'm on slide 15. Quickly, in November we hope that you, since it's already December 1st, completed the transfer A1 list and the swap request – I believe that's done – that you've all sent your letters to participants and host agencies, that communication has started between the donors and the recipient grantees, that you're scheduling participant and host agency meetings for December – for – scheduling them now and to – that that's been done, and that you've submitted your request for transition funding or with the slight variation that we gave you for a slight clarification, more specificity so that we can make reasonable judgments.

In December much of this is – on this chart is about the transfer lists that Terry and Bennett have already talked to you about, but there's specific dates on when you have to get them back. We hope that these lists are going to be extremely helpful to you. The third item about donor and recipient grantees conducting meetings, we've had some questions about, well, whose responsibility is it? Is it the donor's responsibility, or is it the recipient's responsibility? And the answer is both. It is a joint collaborative responsibility, and you can work that out between you.

We are not going to dictate in the weeds that, oh, the letter must come from or the agenda set up, etc. So you work that out between you. If you have problems, you need to let your FPO know, and we'll hopefully run interference. But it's a joint responsibility and a coordinated effort. It says to conduct them on the December list of activities, but certainly early January is okay for having some of those – finishing up with those meetings. Preparing the program files and the recipients are working on their payroll process and documentation and all grantees beginning arrangements to set up and/or close down locations. That's what should be happening in December.

And then, Bennett, if you can – because I'm concerned about our time – quickly go over what's next in January.

MR. PUDLIN: Sure. So we're going to have – as Terry said, version three of the list is going out to you on December 28th. It's due back on January 9th, and that really should be the end of that. We don't expect any changes to have occurred between two and three. It's really just clean-up. There will be exits of course. You'll get the fourth list on January 16th and one last chance for comments, and then after that it's done. We're going to have it programmed into SPARQ so that it's effective on February 1st. The main thrust – I mean, we frontloaded all of this transfer stuff to leave you free to work with participants and to make sure that the documents get transferred. That's the main business in January is if you're completing any of your participant meetings but primarily that you're getting the files transferred. And we covered files in depth in transition call two.

Michi, if you could just pull up those few slides as a reminder, I'm not going to walk through them, but I want people to be aware of them. We have had some reports of confusion. These would be those four slides from transition call two, program file transfer, if we can get those. We've had –

MS. MCNEACE: Bennett. I'm sorry. Bennett, we're – we weren't able to get them loaded up. So we don't have them.

MR. PUDLIN: Oh, okay. Fine. Then I'll just remind people there were some slides. There were four of them that dealt with the issue of program file transfers, and in those slides you will see what DOL expects to be in the participant files. There were two slides that bulleted out about a dozen items, eligibility determinations assessment, IEPs, etc., and then one slide that dealt with host agency files, which are equally important for the recipient to receive. And it is DOL's expectation that these will be provided timely, completely, safely, securely from recipient to donor during the month of January, and if there are problems encountered, we're going to ask the grantees to work them out and, if need be, engage the FPO and the national office liaison.

But this is serious stuff. We don't want the recipients unable to provide appropriate services to the participants they're inheriting, and they've got to have those records. So go back and take a look. Unfortunately, I don't have the slide numbers, but it should be easy enough to find. Please go back and take a look at those lists, and make sure that everybody understands what's expected and are getting these records copied and delivered appropriately. Thanks.

MS. MCNEACE: Thank you, Bennett.

MS. GILBERT: February 1st, 2017, next slide. It's the official transfer date. Participants will be transferred in a batch process through SPARQ on that day, and all files should have been transferred by then. Donor grantee responsibilities, for the participants that you're sending to a new recipient, as of February 1st you are no longer responsible for them.

You are fully responsible for providing services to all of those participants that you're donating until – through January 31st, including paying them. If there are participants that you still have that have been exited prior to the transfer date of the 1st, you are expected to continue with the follow-up activities, even in areas that you've now left behind. But you can certainly work out an arrangement with the new grantee to help out with that. Next slide.

As of February 1st the – basically, the recipient grantee assumes all responsibilities for every participant who's been transferred. So you're going to want to make sure that everybody's accounted for, that they don't miss a paycheck through no fault of their own, that you've got timesheet payroll information, paychecks, all of those things all taken care off.

And that was a heads-up from one of our grantees a while back that they found that in this electronic age, there's differences from one place to another, and you make sure that your participants are – have all – have given you all the information they need to so that you can be sure that they get paid, that their community service assignments continue for 90 days to May 2nd, and that you're honoring the durational limits most favorable to the participant for that time and that transition plans are in place and being carried out, as appropriate. OK.

MS. MCNEACE: OK. Thank you, Judith. But before we move on, we have concluded the DOL update status, but before we move on, Judith, Bennett, is there something that we need to cover that perhaps we may have forgotten? Is there anything else we need to talk about?

MS. GILBERT: I did want to mention a really very wonderful occurrence that happened just within the last couple of weeks. We had a challenge with working very closely with NICOA to find a place for potentially orphan participants for the satisfied grantee needing to lead six different states. And so there were participants who don't get transferred if they're part of a set-aside grant.

And I just want to report to all of you how cooperative and open every single grantee was that we requested to take on a welcoming way all of the 240 participant – well, it was a good number of people that needed to be transferred and not orphaned because of this process. So it was a real testament to what an incredible overall team you all are and we were very heartened and I know NICOA was very pleased as well. They were feeling very positive that, in fact, their grantees are going to be – their participants are going to be welcomed. So thank you, everyone.

MS. MCNEACE: Thank you, Judith. Like we've always said, it takes a village in the SCSEP world.

We have a couple questions that we should go ahead and answer. We have question one, "Who should I contact to talk about the training waiver?" That would typically go to your FPO.

And then our next question is, "Over-enrollment reduction in extreme case, not sure it can be a national deal since I believe PWFB is state specific. Would likely be if a given states were in trouble?"

MS. GILBERT: I think the answer is yes. One of the things that we said earlier is that admin money is not specifically tied to a state but your PWFB money definitely is and so it cannot be moved from one state to another.

MS. MCNEACE: OK. "What constitutes program files for the donor grantee to transfer to the recipient grantee?"

MS. GILBERT: I think Bennett answered that question. It was in the slides from the previous webinar.

MS. MCNEACE: And, "Where is the PowerPoint?" The slide that Bennett was referring to about program files and what the Department of Labor recommends that should be transferred is in transition webinar two, which is located on the CoP. So if you access it there, you'll see those slides.

Do we have anything else? Oh, "If a donor grantee is providing only electronic information and the recipient has difficulty in receiving, what is our option?"

MS. GILBERT: You better be talking to each other and –

MR. PUDLIN: Yeah. I was going to say, we said that electronic files were acceptable, but obviously, only if they can be delivered in a meaningful way to the recipient. And so the grantees have to work that out.

MS. MCNEACE: And that those electronic files contain the laundry list that we noted in the PowerPoint; correct?

MS. GILBERT: Yeah. That's correct.

MS. MCNEACE: OK. So do we have any other questions? If anybody would like to verbalize their question, please hit \*6 to unmute your phone. We're here.

I wanted to say this earlier on. This webinar is what we were hoping for would be more interactive where we're not the ones sitting here doing all the talking. Unfortunately, that's kind of been the case here, but please, if – we would like to kind of engage in conversation, especially when we move forward when we're having our guest presenters talk. So if you do have any questions, comments, please hit \*6 to unmute your phone, or you can always put your questions or comment in the chat.

Well, we're going to go ahead and move on to – we have a poll question. That question is, are you on schedule? Choose the answer that best reflects your position at this time. Oh, look it. Everybody's on schedule. 100 percent. Oh, well, maybe.

MS. GILBERT: Really?

MS. MCNEACE: OK. We have one that's ahead of schedule. We have one that says not quite there, but they think they'll make it. We're sure you'll make it. We have two that are ahead of schedule. Right now, we're – on schedule is leading by a good 90 percent. So that is fantastic. We like to hear that.

So before we get started I just wanted to give a heads up to our guest presenters that you are coming up next. We have given them about five minutes each to give us a little update about what's going on in their world. And our first – do we have any more questions?

MS. GILBERT: We'll get – we probably –

MS. MCNEACE: OK. So if our first guest from NAPCA, Ms. Lee, if you can \*6 and unmute your phone.

EUN JEONG LEE: Hi. Can you hear me?

MS. MCNEACE: We can hear you.

MS. LEE: Great. Great.

MS. MCNEACE: Thank you. Thank you for agreeing to do this with us. So what we're going to do is kind of we – I've kind of given you guys an overview as to what we would like for you to discuss with us briefly and share with your colleagues about the big picture from a donor perspective and a recipient perspective. But give us how many participants and how many states from a donor are you transferring and then how many participants and how many states as a recipient are you gaining.

MS. LEE: So hi, everyone. This is Eun Jeong Lee, national director of the SCSEP program at National Asian Pacific Center on Aging. So to answer Michi's questions, we are having both the donors and recipients, but I would like to say first about donors' perspective. We used – we are right now having four state program under general, but as a result of a new award, we are losing one state. So however, NAPCA, many of our participant in that state Massachusetts is – many of them, they are LEP, limited English proficiency.

So we – (inaudible) – have helped. We are transferring them to our set-aside because NAPCA is in very unique position having both set-aside and general grants. Good thing was we were – we're still operating set-aside grant program in Massachusetts. So I – again, I really appreciate you all's help and support. And as recipients we are receiving about 560 slots from four different national grantees in two states, mostly in California and Illinois.

MS. MCNEACE: Thank you, E. J. So can you tell us about any particular issues that you've incurred thus far?

MS. LEE: Again, we had – (inaudible) – some kind of participants and services because we are serving many LEP participants. I know with your help we are okay now, and then for NAPCA we do not have any issues with laying off or closing down of the local offices at this point. If you say – if you ask me about some challenges at this point, that we are receiving a lot new counties in California and Illinois, and then as we are all aware that enrollment is freeze. So many seniors and even the local host agencies and community-based organizations, they are calling us to ask how they can join the program because they tried to contact a current grantee office and then they found out that the enrollment is freeze.

So we are getting a lot phone calls from potential SCSEP participants. So we are making some – (inaudible) – right now to follow up after February 1st. That is the only challenge we have right now.

MS. MCNEACE: That's fantastic. Great. What about anything about – what about meetings? Are you having any problems setting up meetings or –

MS. LEE: Yeah. So absolutely. We started communication with the donor grantees. We have major in four national grantees working with – working about the transitional process. So we started communication and then I – because with the new area we received we are going to have new subrecipients. So right now, we are in the process of selecting new subrecipients. So we will decided by December 30. So I believe that our transitional meeting and all the transitional activities with donor grantee will happen in January by [inaudible]. Yeah.

MS. MCNEACE: OK. Great. Thank you so much. Thank you. We appreciate that.

MS. LEE: Thank you.

MS. MCNEACE: So we're going to go ahead and move on to our next guest presenter. That would be Ms. Wilkins with National ABLE Network, if you would hit \*6 to unmute your phone.

PATRICIA WILKINS: Hi, everybody. Can you hear me okay?

MS. MCNEACE: We sure can.

MS. WILKINS: OK. So to start with, National ABLE Network, in terms of the donor and recipient part, currently we are in three states, Massachusetts, New Hampshire, and Maine, with about 567 participants. Those slots have always – have all been transferred to a new recipient effective February 1st. So in terms of being totally displaced on the East Coast and now our slots will be in Illinois, Iowa, Nebraska, and then just most recently Indiana. So we're talking about 567 as the donor and about 633 as the recipient.

Part of the challenge was – (inaudible). First of all, just shutting down six offices on the east coast in the middle of the winter is a bit of a challenge in terms of travel, in terms of trying to figure out if the recipient grantee will be taking on that space. That's something that is being discussed. So that's been a bit of a challenge and then just moving in the middle of the winter from two extremely cold and snowy states is going to be a bit of a challenge.

So the other part, like Eun mentioned, is working with the enrollment freeze right now. We are getting a lot of calls from participants and host agencies as well that want to be a part of the program and then explaining to them that we no longer will be their service provider and here's who you need to contact. But, by the way, they won't be able to enroll you until February. It's a bit of a challenge, and for some of the applicants in the areas, it's difficult. And then for host agencies, that they had someone that left the program or exited unexpectedly, that's also a bit of a challenge right now.

MS. MCNEACE: OK. What about did you mention anything about any challenges with meetings, or have you received any responses from participants and/or host agencies?

MS. WILKINS: Well, we have a bit. We have not set up definitive dates yet for transition meetings. I will say on the donor side, I think it's going quite well. The recipient may have a different view, but I think the communication between National ABLE and the two incoming recipient grantees, I think the communication between myself and them, as well as current staff and them has been – is going extremely well.

One of the concerns, though, is in terms of the current staff that is on board there. They're – as people can imagine, they're in a bit of a flux right now not knowing what the future is going to entail, working with us to get all the files transferred and to get the offices closed down as well. So they have really rose to the occasion. They've been doing everything that we have asked of them and I think everything that the recipient grantee has been requesting as well.

But my concern is during this period, if any of these staff members find employment elsewhere, then it kind of throws this whole transition kind of in a spiral because we're on the Midwest now and then we've got the East Coast there. But we're working through some of those, and I know the recipient grantee has interviewed some of the staff and they're making decisions about that.

I also have interviewed staff from the donor grantee that we are working with, and we only have one donor grantee that we are receiving from. And it's been – the meetings have been good. We have made some tentative offers to some of the staff in some of the areas. Going out to meet with other staff in Iowa and Central Illinois within the next couple of weeks and to identify space as well.

One of the challenges on the space side is we know we have to have offices and leases signed and in place prior to February 1. So it presents a challenge in terms of transition funding dollars and all of that, what we can commit to prior to knowing what we may or may not have. So that's a bit of a challenge right now as well.

MS. MCNEACE: OK. Thank you. So have you had participants contacting you wanting to either enroll or they're kind of uncertain as to what's going on?

MS. WILKINS: Well, I will say that what has occurred this week with the donor grantee is that their staff, all of their locations that we're working with, their leases ended yesterday and those staff members officially are not at those locations anymore. They're working from home or other locations, and they have been told also that their last day of employment will be December 31st.

So that presents a double challenge for us trying to work with participants who are not sure where they can go now for service and also who they may or may not be working with after December 31st. Some of those questions I cannot answer. I have reached out to my FPO to find out what direction we should take with this. So that is a huge concern for me right now in terms of doing transition meetings.

I will say on my side, for the donor side we are working with the recipient grantee to identify locations and times, but on – as a recipient I don't think we're into that process as of yet, and I feel that that's going to fall a lot on us as the recipient grantee going into these areas where we are not sure where the best locations might be. And if we don't have staff that we can work with from the donor grantee to identify that, it's going to be a challenge in setting up these transition meetings.

MS. GILBERT: Pat, you said that you had reached out to your FPO, which is absolutely appropriate, about your concern about this issue. Have you talked to the donor grantee directly and asked how they intended to continue to provide services to participants through January 30th, which is what they're paid to do?

MS. WILKINS: What – yes. I have, and generally, the answer has been that it will be handled from the national office.

MS. GILBERT: OK. That's helpful to us to know that you've asked the question because that is, quite frankly, the operative question here. How are services to participants being provided by – from any donor grantee during this period when they know that they're no longer going to be serving the person come February 1st?

But under every grantee's contract that they signed at the beginning of the year and the funding that they have, it is sufficient funding to provide appropriate services to participants throughout the period of performance, which for every one of you as donor grantees, ultimately is through January 31st. Is there 31 days in January – 31 before – up to February 1st. Thanks.

MS. WILKINS: OK.

MS. MCNEACE: Great. Thank you. Is there anything else, Ms. Wilkins?

MS. WILKINS: No. I think just the transition itself is – I'm sure it's stressful for everyone on all parts, but we're pushing through and trying to keep the participants at the center and focused on them and move forward.

MS. MCNEACE: All right. Well, thank you, and thank you for your candor, for sharing. So we're going to go ahead and move on to our next guest presenter. Pat, if you would mute your phone, and Easter Seals, Crystal Odom, Ms. Odom, if you would \*6 to unmute your phone.

CRYSTAL ODOM: OK. Can you hear me?

MS. MCNEACE: We can.

MS. ODOM: OK. Hi, everyone. Good morning, good afternoon, everyone. Just reporting out on Easter Seals' activities, for the big picture I have Max Zielinski our assistant program administrator here with us. He's going to report out on the numbers as it relates to our count with the donors and recipients and what's going on.

MAX ZIELINSKI: Thanks, Crystal, and welcome, everybody. We're – like most people, we get – we're receiving some participants, and we're also donating some. And so big picture is that we're receiving participants from three separate grantees, and that's going to total 876. And we're also donating out participants to three separate grantees, and that comes to 195.

MS. ODOM: OK. All right. Thanks, Max. In regards to where we are with our infrastructure, there's no impact on the grantee level. However, we do have – we're experiencing office closures with one subgrantee, one territory, and starting up new office locations with the other three subgrantee territories.

As it relates to staffing and the impact on staffing, no impact on our grantee level. However, on a subgrantee level one of our subs is closing down and one is experiencing a hiring freeze due to the reduction in slots and several others are working to un-board staff due to those – to the additional slots in those areas.

MS. MCNEACE: Great. Thank you. What about participants? Have you heard from participants, from host agencies? Are there any challenges there? And what about meetings and communication in general?

MS. ODOM: Sure. With the participants we've – dissemination of our donor letters for the participants are currently going out, and meetings have commenced for about roughly 30 percent of our projects. And we've received reports that they've been eventful so far. The majority of them are scheduled for this month in December, and then a few for early January. With the holidays approaching, many staff – many of our staff are working very hard to make this a smooth transition and providing support where needed.

As you know, as the inclement weather season approaches, we may experience lower attendance numbers. So we'll have in place alternate options like one-on-one meetings, where available, as well as teleconferences and webinars with the hopes of encouraging all participants to reach out to us with any questions or concerns they have. And we've also provided a toll free number to them that we use here at the national office. We have a couple of trainees that we train under quality assurance. So they'll be on board as well just to answer questions and to route them accordingly to us.

MS. MCNEACE: That sounds fantastic. So there's a mechanism in place to ensure that you capture all participants, that those participants might not have gotten a letter or did – wasn't able to make the meetings; correct?

MS. ODOM: Yes.

MS. MCNEACE: Great. Is there anything else? Anything – any recommendations or anything you would like to share with your peers at this time?

MS. ODOM: Yeah. Well, we've done the same thing with host agencies as with participants. We're in the process of notifying them as well and scheduling meetings, pretty much the same thing as with participants – with the participant meetings. We're putting the proper controls in place during this inclement weather season to ensure that they get the information, that either they're on a call or they're in our face or we're in their face. So we're just being sure that all of them can know what's going on and to also reach out to us if they have any questions or any concerns.

MS. MCNEACE: OK.

MS. ODOM: Yeah.

MS. MCNEACE: So my last question is, being that you subgrant out to your affiliates, so you being at the national level of Easter Seals, are you very much involved with the activities that are happening at your affiliate or subgrantee level?

MS. ODOM: Yes. We are. We're very involved. Max has led our transition efforts here in our office, and we are very much involved. We have spreadsheets that we've created so we know the dates of the meetings and how many are attending and what's going on there. We know the numbers, and we're in pretty good contact with our folks – with our subs. We have a very intimate relationship with them.

MS. MCNEACE: OK. Great. Are you attending these meetings yourself, or are you just leaving it up to your subs?

MS. ODOM: Yes. We are attending. Carol Salter has been out to a couple. She was in Connecticut last week, and she's been in Oregon. And we've all been going out, and we will be at most of the meetings. One of us will be there, Max, Carol, or myself.

MS. MCNEACE: OK. Great. Thank you. Thank you very much. So we would like to thank all three guest presenters for taking the time and sharing with us. And what I walk away with listening to the three grantees is that their success is based on their strong communication, the coordination, and collaboration with donor and recipients.

MS. GILBERT: Absolutely.

MS. MCNEACE: So that kind of equals the ability to be successful in this whole transition period.

MS. GILBERT: I also think that it's critically important to recognize what the challenges are. Only when you're aware of them and you've opened about them can you begin to address them.

MS. MCNEACE: Exactly. Exactly. So we thank you for sharing that with us.

What we're going to do now is, being that we would like to kind of get a opportunity for other grantees to share briefly, so what I'm going to do is pass it on to Judith and she is going to do an open discussion forum and it's going to be quick and quick.

MS. GILBERT: We just wanted to give all of the rest of you an opportunity to share with us very briefly any challenges that you're facing or any particular wonderful successes that you've had in this very complex and intensive process.

So what I want to do is go through the master list, and if there's anyone from that grantee – hopefully, there's someone on the call – you may not be – have access to a phone line, but if you can just type something into the – identify yourself and type into the chat box, then everyone else can see it. And we'll just sort of go. But if you do have access to the phone line, when we get to you, please jump in and we'll hear your voice.

MS. MCNEACE: Hit \*6 to unmute your phone.

MS. GILBERT: Right. So anybody there from AARP Foundation, if you can just – just a quick update on any particular challenges or successes and just identify yourself as that.

MS. MCNEACE: We have Devon Hearn (sp) with AARP is here, and he's typing into the chat. He doesn't have access to the phone line. So we are going to –

MR. PUDLIN: While we're waiting on that, Judith, a question came in asking again about the deadline for submitting the mod two budget and equipment request and wanted to understand if Monday, December 5 is still the deadline.

MS. GILBERT: That I would believe would be 30 days from the time of your NOA. If you need an additional couple of days, that's okay, especially those of you who have swaps that it may take you a little bit longer to put the material together. If you can get it in by the 5th, that's perfect, but the grants officer on the last call made it clear and I confirmed with him yesterday that a couple or three days more is okay, if you really need it.

MS. MCNEACE: OK. Devon said, "Transition is going well. Working to solidify location staff and get participant information to make sure we can facilitate payroll in February."

MS. GILBERT: Excellent. How about ANPPM? Camella (ph) or anyone from you there either on the phone or typing in?

MS. MCNEACE: You can hit \*6 to unmute your phone.

MS. GILBERT: And Jim Seith has just commented that, "Extra time for a mod is fine, only if we have the mod from which to work." And Bennett I think talked earlier about getting the – the NOA is what your program – it's technically a mod, but you're just responding to the questions. And what you need to do is incorporate your swap information in there, and we can work with you offline with your FPO if there's a specific question and yours may require that.

MR. PUDLIN: Right. Just to be clear, to the extent that you're required to submit updated information on the territory you're serving and that's affected by a slot, we're going to be providing that to you so you don't have to make it up yourself.

MS. GILBERT: And when will that be, Bennett, approximately?

MR. PUDLIN: No later than the middle of next week.

MS. GILBERT: Perfect. Thanks.

MS. MCNEACE: A4TD.

MS. GILBERT: A4TD, you're already answering because you know you were coming next because you know the alphabet. That's wonderful. What does it say from Mary Branagan?

MS. MCNEACE: She says, "We have interviewed fabulous staff from donor grantee. We are setting up transition meetings to be conducted within two teams simultaneously."

MS. GILBERT: Perfect.

MS. MCNEACE: Fantastic. Then we have NCOA said, "Territory, no sweat. We have a budget change."

MS. GILBERT: That's why I said we'll talk to you offline. Thanks, Jim. We've heard from Easter Seals. Anyone from Experience Works? Either hit your phone – if you're on the phone, call in, or type something.

MS. MCNEACE: We have multiple attendees typing. So we're –

MS. GILBERT: Maybe all of you are going through the alphabet and saying, oh, she's going to get to me next.

MS. MCNEACE: They're getting ready.

MS. GILBERT: I love it.

MS. MCNEACE: So we can move on to the next and come back to EW.

MS. GILBERT: Yeah. Good Will?

MS. MCNEACE: Good Will Industries.

MS. GILBERT: Anybody on the phone? Maybe not.

MS. MCNEACE: We have Good Will.

MS. GILBERT: OK.

MS. MCNEACE: "We have a lot of excited Good Wills that have been working very hard to make this a smooth transition for older Americans."

MS. GILBERT: OK.

MS. MCNEACE: Thank you.

MS. GILBERT: Kevin Billiot from the Institute for Indian Development, you're a new grantee, but anything in particular you want to talk to us – share with your colleagues at this point?

Q: Hey, Ms. Judith. How you doing?

MS. GILBERT: Oh, hi. We're glad to hear a voice.

Q: I'm here. So we are working with our subgrantees in the four states and basically setting up new offices and doing all the great things you have to do to run the program. So we've been busy and actually working with the subgrantees to find out exactly some of the counties that they're still looking for or that they want to work in. As you know, like a lot of other people, there's a lot of recipients and donors. So we're going to actually be doing a lot of recruiting. So we're excited. Everything's going pretty smooth. We're updating a lot of our paperwork and information.

MS. GILBERT: Terrific. Paul Magnus, Mature Services or anyone else from Mature Services? Anyone there?

MS. MCNEACE: While we wait for that, we did get response from Experience Works. One says, "Yes. We are concentrating on the process of scanning the participant [inaudible] files" –

Q: Can you hear me, Judith?

MS. MCNEACE: – "and communicating with the recipient grantees in sharing electronic files and data. And everything is going great, and we will have staff to serve participants in each state up until February 1." Thank you for that. And I believe somebody may have dialed in?

Q: Yes. This is Paul.

MS. MCNEACE: Hi, Paul.

Q: Hi. Yes. We've been having telephone conferences, and we did some internal switches with our state grantee to make clear the swaps we had to do in Ohio, and we've got everything into equitable distribution.

MS. GILBERT: Fantastic. Thank you.

Q: You're welcome.

MS. GILBERT: We've heard from AMPP, the National Center – NAPCA already and National ABLE. Next on my list, National – NCBA. Anyone there from NCBA, Ms. Carter or someone else? What's going on with NCBA?

MS. MCNEACE: If you care to speak with us, hit \*6 to unmute your phone or of course send us a message in the chat line.

MS. GILBERT: Next one up is NCOA, and I see both Jim and Tim Hamre have typed something in.

MS. MCNEACE: It said, "Cooperation from Experience Works has been great, and NCOA meeting starts today. Clean spreadsheet data continues to be a challenge. Detail varies from donor to donor. Working through it. Our goal is a clean upload into our case management system to generate time sheets. Transition dollars for vast new geographical areas, especially for offices and salaries in January, a challenge. Admin is insufficient for all." Thank you for sharing that.

And then we have NCBA. Debra says, "I'm here, and we are coming in now. Sorry for the delay."

MS. GILBERT: Who is Mark?

MS. MCNEACE: Mark – Mark, can you identify which grantee you're with? Don't be shy. Hit \*6 and unmute your phone line, if you're called in. Mark with ANPPM?

Q: Mark is Operation ABLE.

MS. GILBERT: Oh, Mark is Operation ABLE.

MS. MCNEACE: Operation ABLE is [inaudible]. Hi, Mark with Operation ABLE.

MS. GILBERT: Hi, Mark.

MS. MCNEACE: He states, "In regular communications with donors and will have a participant meeting soon. Other meetings are being set up and are talking to donor staff regarding new positions. Hoping to secure space soon." Thank you, Mark with Operation ABLE.

Then we have ANPPM, "Working with all the donor grantees. They have been very helpful. We have started transitional meetings. Looking into setting up new locations." Thank you, Nelson.

MS. GILBERT: NOWCC, NOWCC you're – that's how you want us to pronounce your name. Anyone there either on the phone or can type in? You're a new grantee, and we'll obviously be getting to know you over the time coming.

MS. MCNEACE: Kathlynn (sp)?

MS. GILBERT: Catherine. Kathleen.

MS. MCNEACE: "All is well with NOWCC in Arlington, Virginia. We are on target to meet the deadlines. We appreciate the webinars." And she says, "Thank you." And we thank you.

MS. GILBERT: How about National Urban League? Anyone there from NUL?

MS. MCNEACE: Here's NUL. "Transition is moving along at a good pace for the Urban League and its affiliates. Meetings are scheduled. Swaps have been completed in Pennsylvania and New York, and game plans are being developed with donor recipient grantees. File transfer and participant transitions. Challenges in the new territory include looking for remote and/or temporary space in our new location in Florida, which is in central Florida. Covers a lot of area." Oh, yes. It does. "Also, there is a need for SPARQ training for our new and existing program. Otherwise, all is well." Thank you.

MS. GILBERT: I see something from Sierra National, which is pretty much almost next on my list.

MS. MCNEACE: OK. It says, "We are interviewing and hiring new staff. Also, we are out locating space for new offices. All participants and host agencies have been notified, and we are continuing transition activities." Thank you.

And then we have something there from NICOA. "Still having issues with transfer in Oklahoma. We need your help. We are not on the phone. Confusion is knowing who the subgrantee are of the grantees that were identified as recipients of our participants. Meetings have been scheduled for participants and host agencies.

MS. GILBERT: Cheryl, you should be I think working with your FPO, with Charles if you're still having trouble making contact with the appropriate subgrantees. I know that what you're wanting – needing to do is voluntarily transferring participants in Oklahoma because you're serious over-enrolled there and will not have funding going forward for as many – anywhere near as many people as you have now.

So we would encourage you to talk to your FPO, and hopefully, the grantees that are hearing this will be responsive as well. We will be going over all of these things with all of the states on the all grantee call next week too. So in some instances states are involved in some of the transfers, and they're probably not – they may not be as quite up to speed as you all are with doing transitions.

MS. MCNEACE: OK. NCBA did come. They said, "NCBA is doing very well. We are on target with transition. Letters have gone out. Transition meetings are happening now, and many thanks to NCOA, AARP, EW for their outstanding assistance."

MS. GILBERT: And Macanin (sp), your grantee is which? I'm not sure. Macanin, if you could identify your grantee.

Q: It's NCBA.

MS. MCNEACE: It's NCBA. OK. Thank you.

MS. GILBERT: And so only two left on my list that we haven't called on. We have heard from Operation ABLE in greater Boston, Mark, and it's Senior Service America and The Work Place, who is one of the new grantees.

MS. MCNEACE: Well, we have Senior Service America, "Transition activities are going well, and meetings are being set. We are working well with the other grantees. We have appreciated these transition webinars." Thank you.

And we have The Work Place; right?

MS. GILBERT: Uh-huh.

Q: Hi. This is Joyce from The Work Place.

MS. GILBERT: Hi. Nice to hear your voice.

MS. MCNEACE: Hi.

Q: It's great to be back, and things are going really well. The transition meetings are beginning, and they're happening weekly for the next six weeks or so. And everyone's really been wonderful. So it's going well. We're right on target.

MS. MCNEACE: Fantastic. Thank you for sharing that, and welcome back.

Q: Thank you.

MS. MCNEACE: OK. So, Judith?

MS. GILBERT: We do thank you all. We do want to hear from you about any technical assistance needs that you have, and you should send them specifically to the transition mailbox. And we also want to talk about future webinars and calls.

The other question that has come up is the possibility of subbing to – in certain areas and particularly to the states. So what we would ask you to do is, if you as a national grantee are interested in being a sub, no commitment to anything but that you're open to that option, if you would send a – an e-mail to – you can send it to me directly, gilbert.judith.c@dol.gov, and just let me know that you're interested in doing that.

And then what we will do is we will provide the states who are asking us about that a list of who might be interested in being a sub. I know I've heard – I've talked with two or three of you already that are interested in that. So please at this point reconfirm with me or any others want to add yourself to this list that we can then give to the states as perhaps possibilities for them to consider.

MS. MCNEACE: Great. Thank you. That actually –

MS. GILBERT: We do have a question about – on the next slide about – I don't know if it's a poll or not. I think it may be.

MS. MCNEACE: It's a poll.

MS. GILBERT: Yes. These – this was the last scheduled transition call that we firmly scheduled, but we said that we would do one or two or three more as needed in December and January. So we just need to sort of hear back from you what makes sense from your perspective as to what's useful and helpful. So if you can – and you can check as many of these as make sense to you.

MS. MCNEACE: Polling now. Polling now. Early January sounds like it's taking the lead.

MS. GILBERT: And we like people who say it doesn't matter. Just tell me. That makes our life easy.

MS. MCNEACE: OK. So looks like possibility of early January.

MS. GILBERT: If anybody – if there's a way to write in the comment thing people who've said mid-December, if there are specific kinds of things that you need within the next couple of weeks and not waiting until early January, let us know what that is and we can hopefully respond to that. So we – at least from this, we will plan to schedule a call, and we'll let you know as quickly as we can when that will be in early January so that you can get it on your calendar.

MS. MCNEACE: Fantastic. So this actually concludes the webinar for all grantees with the exception of our newbies, which is IID, NOWCC, Operation ABLE, and The Work Place. So aside of those four, anybody who wants to go ahead and say goodbye to us, we want to just say thank you for joining us. And if you have any questions or if there's any technical assistance needs, please reach out to your FPO, and we will get back with you as soon as possible. And thank you again.

MS. GILBERT: But you're certainly free to stay on as we go through some of these basic kind of things, if you would like to do that. We're not asking you to leave.

MS. MCNEACE: No. It's an option.

MS. GILBERT: It's an option.

MS. MCNEACE: So we'll give them a couple minutes. And our new grantees, can you put in the chat box whether or not you are dialed in on the phone line?

MS. GILBERT: Kevin is from IID and –

MS. MCNEACE: TWP.

MS. GILBERT: – and Joyce from The Work Place. And NOWCC and Operation ABLE are not, I don't think, but you're here. So that's important.

MS. MCNEACE: Not dialed in. Not dialed in on the phone. OK.

OK. So can we ask NOWCC and Operation ABLE if you guys could go ahead and dial in on the phone line? That would be great, and we could type in the number. It's in the chat room, the number. OK. There we go.

MS. GILBERT: So and if those of you who are from the four new grantees that have already – are dialing in now or have already dialed in, you should feel free to unmute your phones now, if you'd like, and so that you can ask us any questions as we're going through these things.

Let's get started with the slide number 30 and say welcome to all of you. We've got a list here of things that are absolutely essential for you to have. So SPARQ access is one, and we talked about that a little bit earlier. You'll get that shortly. The InfoSPACE access, you need to get your hands on the Data Collection Handbook and the Data Validation Handbook and the QPR Handbook. Those are all SPARQ related, but there's a lot more information in there.

You want the Code of Federal Regulations, which we've been referring to them already several times, but it's 20 CFR 641 where the SCSEP regulations are. The Older Americans Act was most recently amended in 2016, but it's mostly minor performance measure changes and they don't actually go into effect yet. So the one that I would recommend that you really get extremely familiar with is the 2006 amendments that basically didn't get changed very much at all when the Congress reauthorized the legislation this spring. And –

MR. PUDLIN: Judith, just a detail. The 2006 amendments are reflected in the 2010 regulations.

MS. GILBERT: Yes. That's correct. And then your FPO's contact information, and we've got a couple of slides a little bit later on that tell you who your FPO is, if you don't already know. And I think I've seen all – most of them on the call earlier today, but just so you know for sure, IID, your FPO is Charles Cox in Dallas. NOWCC it's Matt Capucini who's in region two in Philadelphia. And Suzanne Pouliot in region one in Boston has both Operation ABLE Boston and The Work Place.

So the next slide is about policies. These are policies that you need to have, and we'll go through them one by one. The IDL policy – that's the individual durational limit policy. Just to bring you up to speed on this, the Congress in 2006 for the very first time put a time limit on when – how long a person could stay in the program, and it's basically four years. However, there are ways to possibly extend that time, and there are three options that we've identified for people and they're on the optional special request list, the first item.

What you have to have is a policy in place, and it stays in place until you request a change to one of the other – of the three policies. What we have determined because you – there was no way that you could come up with one, is to give you one for this transition period. And because we – all of the IDL policies are the policy that's most favorable to the participant, we chose to give you temporarily until you change it, if you want to, the policy that allows a participant to – it's option two on the list – to extend beyond the four years, if they meet any one of the seven waiver factors that are listed in the statute and in the regulations.

And so that's what we – I think we talked about this one other time, but this is the policy that is – that you have at the moment, and there are rules about changing it. You'll see that in the optional special request list.

You must have a termination policy for how you're going to move a participant out of the program. And we do not approve those policies, but we do have to have a copy of them. And we would be happy to share with you some other policies of other grantees, if that is something that you need. The same with the complaint and grievance policy, and we must have a copy of that also. It needs to be a transparent policy for participants, and it definitely needs to have a structure that is very clear as to what a participant needs to do to initiate a grievance or a complaint and then how they are getting – how they get resolved, with whether it's meetings or whatever kind of contact and then how it goes – it gets appealed.

It only comes up to the Department of Labor once a participant has exhausted all of the appeals at the grantee level, but both the termination and the complaint and grievance policies are the kinds of things that we get questions about all the time. Participants write to the president. They sometimes don't follow the policy. It's really incumbent upon you as you get new participants or get people transferred to you that you share with them, give them copies of the policies that you have so that they are fully aware of what their rights and their responsibilities are.

MR. PUDLIN: Judith, if I may, just a detail on the termination policy. In fact, while much of that is dictated by statute, there are parts that do require DOL approval. So, for example, if the grantee wishes to terminate participants for failure to comply with their IEP, that has to be approved. And so in general, the department has been receiving and commenting and approving termination policies. Grievance not – as you said, there's no approval requirement. Just a filing.

MS. GILBERT: On the other hand, we do feel a responsibility to take a look and to let you know if something seems out of the – kind of the mainstream and maybe ask you about it because I know –

MR. PUDLIN: Yeah. I just say three of the four – we call you newbies, but three of the four of you have direct experience running the program, and these policies were all in effect during your tenure as SCSEP grantees or subgrantees. So our role has really not changed in that regard, and as Judith said, we have some pretty good model termination policies that I think three different grantees developed, all of which were found acceptable by DOL. So it's not that you have to use them, but if you chose to use them, you'd know you'd be in very good shape legally.

MS. GILBERT: Bennett, talk to them about the approved break policy and what all of that includes, especially –

MR. PUDLIN: Yeah. That's really, really critical for two different reasons. There are requirements in the 2006 amendments that you provide necessary sick leave to your participants, and the department has defined that in regulation such that you have the latitude to determine what's necessary and how you're going to deal with it, whether you're going to pay people wages for it or allow them to make up the work. Similarly, the same is true with the requirement that you provide compensation for lost time at the host agency if it's closed due to a federal holiday.

So the requirement for necessary sick leave is in the statute, in the reg, and it's up to you to define it. So you need a policy, and the easiest way to do that is to incorporate it into a more global policy dealing with leaves without pay or the technical term is approved break and participation. And that brings us to the second reason.

The durational limit requirement that's in the law excludes from the calculation of time in program any time during which a participant was on an approved break in participation. Well, you can't be on an approved break in participation unless there is a policy under which you're approved. And so you need to have one. And again, you have total latitude about how to define that with certain exceptions.

DOL policy says that you have to allow people to be out for a serious illness, workers' comp injuries, and that sort of thing. But you can have notice requirements. You can have penalties for failure to stay in touch. You can terminate if they fail without good cause to return from a break or request an extension and so forth. But again, all of that should be set forth in a policy, and if you have a global one, you can incorporate the necessary sick leave within it.

MS. GILBERT: Bennett, the next slide is about the performance targets, if you want to go over that one quickly.

MR. PUDLIN: Right. So yeah. Just real briefly, the FOA contains the same provision it had in prior years that the goals for the current grantees that were negotiated last spring and governed performance in PY '16, those remain in effect, subject to the right of the national grantees to seek renegotiation based on a change in circumstances because of their new territory. For those of you who are new, you don't have goals that were negotiated for this year.

And so instead, the department assigned you as targets, not goals, the average goals of all the national grantees for 2016. So your target, that is what we want you to aspire to, is performance that meets the average of your national grantee peers. You will not be subject to sanction if you fail to do so, but obviously, if you need technical assistance, you will get it. And you probably, as new people, are going to get a fair amount of training in addition, whether or not there's evidence that you need it.

As you know, we're going to be going through a change in performance measures due to the 2016 amendment of the Older Americans Act. As Judith said, that is not going to be effective – well, we hope it will be in place next year and will be fully effective with PY '18. So you will go through the normal negotiation process with your peers this spring to get real goals for PY '17. I guess I shouldn't say normal negotiation process because we don't quite know what that's going to look like.

It's going to be a transition year for us, and we're all mindful of how much disruption has been caused by this competition. So getting good data to base your goals on for next year will be difficult. So all of that is yet to be worked out. Stay tuned. I'm sure you'll hear something this winter about when the new measures are in effect – will be in effect and what the negotiation process is like. But for now, you just use that slide because I don't know that you'd find the average goals anywhere other than on that slide.

MS. GILBERT: Great. Thanks. The next slide is about the optional special requests. The – it was referenced in your NOA, Notice of Awards from the grant office that you were to ask for these things, if you wanted them. We're not necessarily encouraging anyone to ask for any one of them, but there are basic – what we sent out to you yesterday actually did not include the last one on the list, and I'll tell you why.

The first one is the change in the IDL policy, the operational – individual durational limit extensions, and we just addressed that. So you only use that one if you want to change the option two policy that we sent you. Then – and as I said, there are timelines around when it can take effect and the approval process, etc.

A second one is additional training and supportive services funds, ATSS. The statute allows a – an exception to the 75 percent minimum wage of expenditures on participant wages, and it allows you to use not less than 65 percent on participant wages and fringe benefits. The rules about that are in the regulations at 641.874, and I think they're pretty clear, if you read it. There's been some concern about it over the years, but it says you may provide additional educational services with this money.

You must, if you do, provide – pay the wages out of these funds for the time that the participant is in that additional training. You cannot use this to cover any administrative costs, and there's a fourth thing that it's very clear that you cannot use the money for either. So basically, those four things, and it has to be approved here and it – and the time of its effectiveness is not immediate. So my suggestion to you is that you look at this and consider this for next year, but probably it's not a reasonable thing to think about for these five months.

Extension of the average project duration, this will only come into play after you've been a grantee for a while. I guess, Bennett, not until 27 months have gone by; right?

MR. PUDLIN: Well –

MS. MCNEACE: No. It's not.

MR. PUDLIN: Yeah. You're inheriting all these participants and –

MS. GILBERT: Been in the program a while.

MR. PUDLIN: Yeah. So – but this is – I don't think it's a problem. Nationwide we're doing extraordinarily well. We're – I think we're 18 months average. So if any of you – you'll see this when you get your first QPR. If any of you find yourself with a higher APD than the nationwide, get in touch with us, and we'll look at it carefully with you and help you figure out if there's any concern. But it would be pretty extraordinary, given the current economic climate, if anybody had trouble.

MS. GILBERT: The next one is about on-the-job experience, and there's a – an Older Worker Bulletin 04-04 that should be easily available that describes what you need to do if you want to do an OJE. It basically is for up to 12 weeks that the person is paid can be for more than – certainly more than 20 hours a week, and there are rules about, if it's less than four weeks – four weeks or less, they get paid full salary or you provide that, and then if it's anywhere from – if it goes beyond four weeks, from week 1 to week 12, it's 50 percent.

MS. MCNEACE: That's on a reimbursement.

MS. GILBERT: On a reimbursement basis. Right.

The rotation policy is one that's been in – as an option. If you wish to establish a policy of rotating participants to a new host agency or a different assignment within the same one in a specified time, it really is there because it's in the law and it's allowable and in the regs. But as a practical matter, you have – you cannot do it arbitrarily because any rotations of participants to new agencies or different assignment within the same one really has to be based on their assessment and their IEP.

So some arbitrary six-month, 12-month, whatever flies in the face of that. So it's there as a possibility and in some instances it may be justifiable, in our experience, I don't know that anyone has one at the moment because there are – a couple maybe, but there are ways to deal with providing appropriate services rather than some arbitrary timeline.

MS. MCNEACE: Automated – automatic rotation.

MS. GILBERT: Not anything automatic. Anything automatic is not acceptable because that doesn't take into account an individual's individuality, if you will.

The final one on this list but not on the list that I sent you yesterday was the state grantees – for state grantees only. They can enter into arrangements to permit cross-border enrollment, and that certainly does happen in places like the St. Louis area which is right on the border of two states and for participants it makes sense that it would be – even if you live in one state, your host agency could be in another one. They just work out those things. So there are those – a few of those I think in effect.

That moves us to the last item, and then we're going to give you plenty of chance to tell us if this was helpful or if there's anything else that you need.

MS. MCNEACE: Exactly. And based on our time, it's just the last slide you'll notice where it talks about manage your grant. We say that because we want to share with you that we want you grantees to manage your grant and not let your grant manage you. So in order to do that, it's just making sure that you – as Judith mentioned earlier, is having the federal regulations, understanding the statute, and know what your terms and conditions of the grant agreement is. It outlines what your areas of responsibilities are, what the accountabilities are, and follow that programmatic assurance that your signatory signs off on.

And Judith mentioned earlier make the Data Collection and the Data Validation Handbook your Bible, even for those who may not get into the weeds or in the local area or actually are out there recruiting and collecting data and doing income calculation, knowing what's in those handbooks will become very valuable to everyone.

So I say that from experience. And in the SPARQ, use the SPARQ management reports. They're there for a reason. They're wonderful, but it takes away the guesswork. It takes away the guessing as to when you're supposed to conduct your follow ups, what – when are your durational limits coming up, things of that nature. So use the management report.

Also, put in place a comprehensive monitoring process or strategy. Monitor your program. Monitor the activities that happen from the local level all the way to the top. And we say this because your monitoring helps you to prepare for at any given time that your FPO comes out and does a compliance review on you. And then at any time, please don't be shy. If you need technical assistance, if you need training, please reach out to us. Let us know. We're here to help you.

And for you grantees that have subgrantees, we can't stress this anymore, but please manage your subgrantees. What we see a lot is the fact that once you do – once you pass your grant over to your subgrantees, the responsibility does not get passed over. So you're the grantee. You're held responsible. It's a good idea, if you do subgrant out, to use the programmatic assurances as part of your contractual obligations with your sub.

So we provide – everything that the Department of Labor gives you that you have to sign off on, you may consider using those same language, same terms and conditions with your subs.

So other than that, we're going to go ahead and go to the next slide, and this is just a resource page where it will tell you where you can access the WorkforceGPS Older Workers Community of Practice, where you can access DOL ETA where we post all of the performance and QPRs and other SCSEP information, and of course SPARQ and – (technical difficulties).

MS. CASERTANO: Michi, Judith, is anyone there? I can't hear you.

MR. PUDLIN: I think we lost them again. We lost them. Yeah. Well, we're getting right down to the end here. So I think all that was left was she's walking you through the list of resources on slide 34, and what about – (technical difficulties).

(END)