Grant Modification / Notice of Award

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

GRANT MODIFICATION No. 1

PROJECT:
Senior Community Service Employment Program

GRANT NUMBER:
AD-31820-18-55-A-29

GRANTEE:
MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES
920 WILDWOOD DRIVE
JEFFERSON CITY, MISSOURI 65109-5796

EIN:

EFFECTIVE DATE:
12/18/2018

ISSUED BY
U.S. DEPARTMENT OF LABOR / ETA
DIVISION OF FEDERAL ASSISTANCE
200 CONSTITUTION AVENUE NW - ROOM N-4716
WASHINGTON, DC 20210

Action:
To incorporate the Negotiated Indirect Cost Rate Agreement dated March 9, 2018.

To address conditions of award the Grantee submitted to the Department the SF-424A, Budget Narrative, Program Narrative, Program Assurances and Optional Special Requests in accordance with pages 2 through 41 of this modification.

YEAR / CFDA PROGRAM ACCOUNT ID
Mod 0 CURRENT LEVEL Mod 1 MODIFICATION NEW LEVEL PMS DOC #
PY 18 / 17.235
OLDER AMERICANS - STATE AGENCIES
18-1630-2018-001701819820181750020186DA0D12A00034090940904090-A90200-410223-ETA-DEFAULT TASK-
$1,959,478.00 $0.00 $1,959,478.00 AD31820FS0

TOTAL FUND AVAILABILITY
$1,959,478.00 $0.00 $1,959,478.00

Except as modified, all terms and conditions of said grant /agreement remain unchanged and in full effect.

Approved by

Jimmie Curtis
Grant Officer

Date Signed 01/11/2019
<table>
<thead>
<tr>
<th>Grant Program Function or Activity</th>
<th>Catalog of Federal Domestic Assistance Number</th>
<th>Estimated Unobligated Funds</th>
<th>New or Revised Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(a)</td>
<td>Federal (c)</td>
<td>Non-Federal (d)</td>
</tr>
<tr>
<td>1. SCSEP</td>
<td>17,235</td>
<td>$1,959,478.00</td>
<td>$218,069.00</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Totals</td>
<td>$1,959,478.00</td>
<td>$218,069.00</td>
<td>$2,177,547.00</td>
</tr>
</tbody>
</table>

Standard Form 424A (Rev. 7-07)
Prescribed by OMB (Circular A-102) Page 1
### SECTION B - BUDGET CATEGORIES

#### 6. Object Class Categories

<table>
<thead>
<tr>
<th>No.</th>
<th>Category</th>
<th>(1)</th>
<th>(2)</th>
<th>(3)</th>
<th>(4)</th>
<th>(5) Total</th>
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<tbody>
<tr>
<td></td>
<td>SCSRP</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
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<td>a.</td>
<td>Personnel</td>
<td>$22,144.00</td>
<td>$2,463.00</td>
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<td></td>
<td>$24,607.00</td>
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<td>b.</td>
<td>Fringe Benefits</td>
<td>$12,844.00</td>
<td>$1,429.00</td>
<td></td>
<td></td>
<td>$14,273.00</td>
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<td>c.</td>
<td>Travel</td>
<td>$1,439.00</td>
<td>$160.00</td>
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<td></td>
<td>$1,599.00</td>
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<td>d.</td>
<td>Equipment</td>
<td>$0.00</td>
<td>$0.00</td>
<td></td>
<td></td>
<td>$0.00</td>
</tr>
<tr>
<td>e.</td>
<td>Supplies</td>
<td>$630.00</td>
<td>$70.00</td>
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<td></td>
<td>$700.00</td>
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<td>f.</td>
<td>Contractual</td>
<td>$1,913,949.00</td>
<td>$0.00</td>
<td>$213,006.00</td>
<td></td>
<td>$2,126,955.00</td>
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<tr>
<td>g.</td>
<td>Construction</td>
<td>$0.00</td>
<td>$0.00</td>
<td></td>
<td></td>
<td>$0.00</td>
</tr>
<tr>
<td>h.</td>
<td>Other</td>
<td>$1,019.00</td>
<td>$113.00</td>
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<td></td>
<td>$1,132.00</td>
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<tr>
<td>i.</td>
<td>Total Direct Charges (sum of 6a-6h)</td>
<td>$1,952,025.00</td>
<td>$4,235.00</td>
<td>$213,006.00</td>
<td></td>
<td>$2,169,266.00</td>
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<tr>
<td>j.</td>
<td>Indirect Charges</td>
<td>$7,453.00</td>
<td>$828.00</td>
<td></td>
<td></td>
<td>$8,281.00</td>
</tr>
<tr>
<td>k.</td>
<td>TOTALS (sum of 6i and 6j)</td>
<td>$1,559,478.00</td>
<td>$5,063.00</td>
<td>$213,006.00</td>
<td></td>
<td>$2,177,547.00</td>
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#### 7. Program Income

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(Standard Form 424A (Rev. 7-97) Prescribed by OMB (Circular A-102) Page 1A)
### SECTION C - NON-FEDERAL RESOURCES

<table>
<thead>
<tr>
<th>(a) Grant Program</th>
<th>(b) Applicant</th>
<th>(c) State</th>
<th>(d) Other Sources</th>
<th>(e) TOTALS</th>
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</thead>
<tbody>
<tr>
<td>8. SCSEP</td>
<td></td>
<td>$5,063.00</td>
<td>$213,005.00</td>
<td>$218,069.00</td>
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<tr>
<td>9.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11.</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>12. TOTAL (sum of lines 8-11)</td>
<td>$</td>
<td>$5,063.00</td>
<td>$213,005.00</td>
<td>$218,069.00</td>
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### SECTION D - FORECASTED CASH NEEDS

<table>
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<tr>
<th>Government</th>
<th>Total for 1st Year</th>
<th>1st Quarter</th>
<th>2nd Quarter</th>
<th>3rd Quarter</th>
<th>4th Quarter</th>
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<tbody>
<tr>
<td>Federal</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Federal</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL (sum of lines 13 and 14)</td>
<td>$</td>
<td></td>
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### SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

<table>
<thead>
<tr>
<th>(a) Grant Program</th>
<th>FUTURE FUNDING PERIODS (YEARS)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b) First</td>
<td>(c) Second</td>
</tr>
<tr>
<td>16. SCSEP</td>
<td>$</td>
</tr>
<tr>
<td>17.</td>
<td>$</td>
</tr>
<tr>
<td>18.</td>
<td>$</td>
</tr>
<tr>
<td>19.</td>
<td>$</td>
</tr>
<tr>
<td>20. TOTAL (sum of lines 16 - 19)</td>
<td>$</td>
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</table>

### SECTION F - OTHER BUDGET INFORMATION

- **21. Direct Charges:** See Budget Justification
- **22. Indirect Charges:** Fixed Rate: $8,019.00 See Budget Justification
- **23. Remarks:** See Budget Justification

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### Missouri

SCSEP Budget Justification
PY 2018 - State Fiscal Year 2019

<table>
<thead>
<tr>
<th>Federal Grant Award</th>
<th>Amount</th>
<th>Calculated Level</th>
<th>Budgeted Level</th>
<th>Budget in Compliance?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1,959,478</td>
<td>1,959,478</td>
<td>1,959,478</td>
<td>Yes</td>
</tr>
<tr>
<td>Maximum Total Administration</td>
<td>13.50%</td>
<td>264,529</td>
<td>236,923</td>
<td>Yes</td>
</tr>
<tr>
<td>Minimum Participant Wages &amp; Fringe</td>
<td>75.00%</td>
<td>1,469,609</td>
<td>1,469,609</td>
<td>Yes</td>
</tr>
<tr>
<td>Maximum Contractor Administration</td>
<td>10.00%</td>
<td>191,394</td>
<td>191,394</td>
<td>Yes</td>
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<tr>
<td>Minimum Non-Federal Match</td>
<td>10.00%</td>
<td>217,720</td>
<td>218,069</td>
<td>Yes</td>
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</tbody>
</table>

#### a. Personnel: (Rate x %)

<table>
<thead>
<tr>
<th>Position</th>
<th>Monthly Salary</th>
<th>Monthly FTE</th>
<th>Annual Salary</th>
<th>Annual FTE</th>
<th>Total FTE</th>
<th>Federal</th>
<th>State GR</th>
<th>In-Kind</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V State Coordinator - Brewer</td>
<td>5,457</td>
<td>12</td>
<td>65,834</td>
<td>0.15</td>
<td>9,875</td>
<td>9,875</td>
<td>8,887</td>
<td>988</td>
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<tr>
<td>AOSA – Coffelt</td>
<td>2,507</td>
<td>12</td>
<td>30,434</td>
<td>0.05</td>
<td>1,522</td>
<td>1,522</td>
<td>1,369</td>
<td>153</td>
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<tr>
<td>APSII – Ulstad</td>
<td>3,565</td>
<td>12</td>
<td>43,130</td>
<td>0.28</td>
<td>12,076</td>
<td>12,076</td>
<td>10,888</td>
<td>1,208</td>
</tr>
<tr>
<td>Fiscal and Administrative Mgr B1-Toebben</td>
<td>4,696</td>
<td>12</td>
<td>56,702</td>
<td>0.02</td>
<td>1,134</td>
<td>1,134</td>
<td>1,020</td>
<td>114</td>
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</table>

#### b. Fringe Benefits (Fringe Rate x Personnel Cost)

<table>
<thead>
<tr>
<th>Position</th>
<th>Salary</th>
<th>Fringe %</th>
<th>Total Salary</th>
<th>Total Fringe</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V State Coordinator - Brewer</td>
<td>9,875</td>
<td>58.00%</td>
<td>5,728</td>
<td>5,155</td>
<td>573</td>
</tr>
<tr>
<td>AOSA – Coffelt</td>
<td>1,522</td>
<td>58.00%</td>
<td>883</td>
<td>894</td>
<td>89</td>
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<tr>
<td>APSII – Ulstad</td>
<td>12,076</td>
<td>58.00%</td>
<td>7,004</td>
<td>6,303</td>
<td>701</td>
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<tr>
<td>Fiscal and Administrative Mgr B1-Toebben</td>
<td>1,134</td>
<td>58.00%</td>
<td>658</td>
<td>592</td>
<td>66</td>
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</table>

#### c. Travel:

<table>
<thead>
<tr>
<th>Trips</th>
<th>Total Miles</th>
<th>Rate &amp; Mileage</th>
<th>Rate &amp; Meal Costs</th>
<th>Rate &amp; Lodging Costs</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitoring Subrecipients</td>
<td>4</td>
<td>250</td>
<td>93</td>
<td>160</td>
<td>500</td>
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<tr>
<td>Data Validation</td>
<td>2</td>
<td>250</td>
<td>93</td>
<td>60</td>
<td>250</td>
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<tr>
<td>Technical Assistance</td>
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<td>250</td>
<td>93</td>
<td>80</td>
<td>250</td>
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#### d. Equipment:

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<th>0</th>
<th>0</th>
<th>0</th>
<th>0</th>
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</thead>
<tbody>
<tr>
<td>Conference</td>
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</table>

#### e. Supplies:

<table>
<thead>
<tr>
<th></th>
<th>700</th>
<th>630</th>
<th>70</th>
<th>0</th>
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</thead>
<tbody>
<tr>
<td>Office supplies, meeting supplies</td>
<td>700</td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

#### f. Contractual:

<table>
<thead>
<tr>
<th>Position</th>
<th>Amount</th>
<th>Calculated Level</th>
<th>Budgeted Level</th>
<th>Budget in Compliance?</th>
</tr>
</thead>
<tbody>
<tr>
<td>PWFB (Statewide Federal Grant x 75%)</td>
<td>1,469,609</td>
<td>1,469,609</td>
<td>1,469,609</td>
<td>Yes</td>
</tr>
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</table>
### SCSEP Budget Justification
#### PY 2019 - State Fiscal Year 2019

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>Federal</th>
<th>State GR</th>
<th>In-Kind</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Participant Costs</td>
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<td></td>
<td></td>
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<tr>
<td>Totals</td>
<td>1,913,949</td>
<td>213,006</td>
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</table>

#### h. Other:  

<table>
<thead>
<tr>
<th>Network charges</th>
<th>Rate Per FTE</th>
<th>FTE</th>
<th>Non-Federal</th>
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<tr>
<td></td>
<td>2.263</td>
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</table>

#### i. Total Direct Charges  

<table>
<thead>
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<th>Personnel / Fringe</th>
<th>Rate</th>
<th>FTE</th>
<th>Total</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>21.30%</td>
<td>38,880</td>
<td>8,281</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7,453</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

|                      | 2,169,266 | 1,952,025 | 4,235 | 213,006 |

#### j. Indirect Charges  

|                      | 2,177,547 | 1,959,478 | 5,083 | 213,006 |

| Non-Federal Required | 217,720   |
| Non-Federal Budgeted | 218,069   |

Our Federal Admin: 45,529
<table>
<thead>
<tr>
<th>Area DF</th>
<th>Authorized Positions</th>
<th>Total</th>
<th>Maximum</th>
<th>Minimum</th>
<th>Other Participant Costs</th>
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</thead>
<tbody>
<tr>
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<td>Administration</td>
<td>P.W.F.B.</td>
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<td>Clark County</td>
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<td>Lewis County</td>
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<td>61</td>
<td>577,975</td>
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<tr>
<td>Marion County</td>
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<td>25.2475%</td>
<td>Area E</td>
<td>51</td>
<td>483,225</td>
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<tr>
<td>Scotland County</td>
<td>1</td>
<td>100.0000%</td>
<td>Totals</td>
<td>202</td>
<td>1,913,950</td>
</tr>
<tr>
<td>St. Charles</td>
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<td>Percentages</td>
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<td>10.00%</td>
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<tr>
<td>St. Louis County</td>
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<tr>
<td>St. Louis City</td>
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<tr>
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<tr>
<td>Area DF</td>
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<td>10.00%</td>
<td>Percentages</td>
<td>90</td>
<td>10.00%</td>
</tr>
<tr>
<td>Area G</td>
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<td>Percentages</td>
<td>90</td>
<td>10.00%</td>
</tr>
<tr>
<td>Cape Girardeau County</td>
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<td>10.00%</td>
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<tr>
<td>Gasconade County</td>
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<td>10.00%</td>
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<tr>
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<td>Percentages</td>
<td>90</td>
<td>10.00%</td>
</tr>
<tr>
<td>Area E</td>
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<td>10.00%</td>
</tr>
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<td>Cass County</td>
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<td>Percentages</td>
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<td>10.00%</td>
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<tr>
<td>Clay County</td>
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<td>Ray County</td>
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<tr>
<td>Area E</td>
<td>51</td>
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<td>Percentages</td>
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</tbody>
</table>
The contractual portion of the grant budget includes Administrative Costs, Participant Wages and Fringe Benefits (PWFB) and Other Participant Costs (OPC). The PWFB budget includes costs for annual physical exam, workers compensation coverage, and unemployment compensation coverage. The OPC budget includes allowed supportive services (such as bus passes, specific work attire, training certificates, etc.) necessary for the participants training or unsubsidized employment needs.
6. Indirect Cost Rate and Cost Allocation Plan

**X** A. A current federally approved Negotiated Indirect Cost Rate Agreement (NICRA) or current federally approved Cost Allocation Plan (CAP) has been provided – copy attached. Regarding only the NICRA:

1. Indirect Rate approved: 21.30%
2. Type of Indirect Cost Rate: Fixed
3. Allocation Base: SEE NICRA
4. Current period applicable to rate: 7/1/2018-6/30/2019

Estimated Indirect Costs are shown on the SF-424A budget form. If a new NICRA is issued during the life of the grant, it must be provided to DOL within 30 days of issuance. Funds may be re-budgeted as necessary between direct and indirect costs consistent with institutional requirements and DOL regulations for prior approval, however the total amount of grant award funding will not be increased. Any budget changes impacting the Statement of Work and agreed upon outcomes or deliverables require a request for modification and prior approval from the Grant Officer.

**B.**

1. Latest NICRA or CAP approved by the Federal Cognizant Agency\(^1\) (FCA) is not current, or
2. No CAP has ever been approved by an FCA.

**URGENT NOTICE:** Estimated indirect costs have been specified on the SF-424A, Section B, Object Class Category “j”, however only 10% of the Personnel line or the total Indirect line (whichever is less) will be released to support indirect costs in the absence of a NICRA or CAP approved by the cognizant agency. The remaining funds which have been awarded for Indirect Costs are restricted and may not be used for any purpose until the awardee provides a signed copy of the NICRA or CAP and the restriction is lifted by the Grant Officer. Upon receipt of the NICRA or CAP, ETA will issue a grant modification to the award to remove the restriction on those funds.

The awardee must submit an indirect cost rate proposal or CAP. These documents should be submitted to DOL’s Division of Cost Determination (DCD), or to the awardee’s Federal Cognizant Agency. In addition, the awardee must notify the Federal Project Officer that the documents have been sent. Contact information for the DCD is available at [http://www.dol.gov/oasam/boc/dcd/](http://www.dol.gov/oasam/boc/dcd/). If this proposal is not submitted within 90 days of the effective date of the award, no funds will be approved for the reimbursement of indirect costs. Failure to submit an indirect cost proposal by the above date means the grantee will not receive further reimbursement for indirect costs until a signed copy of the federally approved NICRA or CAP is provided and the restriction is lifted by the Grant Officer. All indirect charges must be returned through the Payment Management System and no indirect charges will be reimbursed.

The total amount of DOL’s financial obligation under this grant award will not be increased to reimburse the awardee for higher negotiated indirect costs.

\(^1\) The Federal agency providing the organization the preponderance of direct Federal funds.
C. The organization elected to exclude indirect costs from the proposed budget. Please be aware that incurred indirect costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are indirect costs. Only direct costs, as defined by the applicable cost principles, will be charged. Audit disallowances may occur if indirect costs are misclassified as direct.

D. The organization has never received a negotiated indirect cost rate and, with and pursuant to the exceptions noted at 2 CFR 200.414(f) in the Cost Principles, and has elected to charge a de minimis rate of 10% of modified total direct costs (see 2 CFR 200.68 for definition) which may be used indefinitely. This methodology must be used consistently for all Federal awards until such time as you choose to negotiate for an indirect cost rate, which you may apply to do at any time. (See 2 CFR 200.414(f) for more information on use of the de minimis rate.)

If DOL is your FCA, grantees should work with DOL’s DCD, which has delegated authority to negotiate and issue a NICRA or CAP on behalf of the Federal Government. More information about DOL’s DCD is available at http://www.dol.gov/oasam/boc/dcd/. This website has guidelines to develop indirect cost rates, links to the applicable cost principles, and contact information. The DCD also has Frequently Asked Questions providing general information about the indirect cost rate approval process and due dates for provisional and final indirect cost rate proposals at http://www.dol.gov/oasam/faqs/FAQ-dcd.htm.
March 12, 2018

Ms. Pat Bedell
Deputy Director of Division of Administration
Missouri Department of Health & Senior Services
P. O. Box 570
Jefferson City MO 65102-0570

Dear Ms. Bedell:

We are currently transmitting agreements by email. Please have the agreement signed by an authorized representative of your organization and email it to CAS-NY@psc.hhs.gov. We will reproduce and distribute the Agreement to the appropriate awarding organizations of the Federal Government for their use. This agreement reflects an understanding reached between your organization and a member of my staff concerning the rate(s) that may be used to support your claim for indirect costs on grants and contracts with the Federal Government. Future proposal should be submitted electronically to CAS-NY@psc.hhs.gov.

The fixed rate for the fiscal year ending June 30, 2018 is based on actual costs for the fiscal year ended June 30, 2016.

They include under-recovery amount of ($924,038).

The fixed rate for fiscal year June 30, 2016 is considered final.

The fixed rate for the fiscal year ending June 30, 2019 is based on actual costs for the fiscal year ended June 30, 2017.

They include over-recovery amount of $716,017

The fixed rate for fiscal year June 30, 2017 is considered final.

An indirect cost proposal, together with supporting information, is required each year to substantiate claims made for indirect costs under grants and contracts awarded by the Federal Government. Thus, your next indirect cost plan based on actual costs for the fiscal year ending June 30, 2018 are due in our office on December 31, 2018.

Thank you for your cooperation. If you have any questions, please call Wanda Rayfield at (214) 767-5249.

Sincerely,

Darryl W. Mayes
Deputy Director
Cost Allocation Services

Enclosures
STATE AND LOCAL GOVERNMENTS RATE AGREEMENT

EIN: [Redacted] DATE: 03/09/2018

ORGANIZATION: FILING REF.: The preceding
Missouri Department of Health & Senior agreement was dated
Services 03/07/2017
P.O. Box 570
Jefferson, MO 65102-0570

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government, subject to the conditions in Section III.

SECTION I: INDIRECT COST RATES

<table>
<thead>
<tr>
<th>RATE TYPES:</th>
<th>FIXED</th>
<th>FINAL</th>
<th>PROV. (PROVISIONAL)</th>
<th>PRED. (PREDETERMINED)</th>
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**EFFECTIVE PERIOD**

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<tr>
<th>TYPE</th>
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<th>TO</th>
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<td>FIXED</td>
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<td>PROV.</td>
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<td></td>
<td></td>
<td>Use same rates and conditions as those cited for fiscal year ending June 30, 2019.</td>
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</tbody>
</table>

*BASE

Direct salaries and wages including all fringe benefits.
SECTION II: SPECIAL REMARKS

TREATMENT OF FRINGE BENEFITS:
The fringe benefits are specifically identified to each employee and are charged individually as direct costs. The directly claimed fringe benefits are listed below.

TREATMENT OF PAID ABSENCES
Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the cost of these paid absences.

Fringe Benefits
FICA
Retirement
Disability Insurance
Life Insurance
Health Insurance
Worker's Compensation
Unemployment Insurance

Your next indirect cost rate proposal based on actual costs for the fiscal year ending 06/30/2018 is due in our office by 12/31/2018.
SECTION III: GENERAL

A. LIMITATIONS:
The rates in this Agreement are subject to any statutory or administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions:
(1) All costs incurred by the organization were included in its indirect cost pool as finally accepted; such costs are legal obligations of the organization and are allowable under the governing cost principles;
(2) The same costs that have been treated as indirect costs are not claimed as direct costs; and
(3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the organization which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

B. ACCOUNTING CHANGES:
This Agreement is based on the accounting system purported by the organization to be in effect during the Agreement period. Changes to the method of accounting for costs which affect the amount of reimbursement resulting from the use of this Agreement require prior approval of the authorized representative of the cognizant agency. Such changes include, but are not limited to, changes in the charging of a particular type of cost from indirect to direct. Failure to obtain approval may result in cost disallowances.

C. FIXED RATES:
If a fixed rate is in this Agreement, it is based on an estimate of the costs for the period covered by the rate. When the actual costs for this period are determined, an adjustment will be made to a rate of a future year(s) to compensate for the difference between the costs used to establish the fixed rate and actual costs.

D. USE BY OTHER FEDERAL AGENCIES:
The rates in this Agreement were approved in accordance with the authority in Title 2 of the Code of Federal Regulations, Part 200 (C.F.R. 200), and should be applied to grants, contracts and other agreements covered by 2 C.F.R. 200, subject to any limitations in A above. The organization may provide copies of the Agreement to other Federal Agencies to give them early notification of the Agreement.

E. OTHER:
If any Federal contract, grant or other agreement is reimbursing indirect costs by a means other than the approved rate(s) in this Agreement, the organization should (1) redistribute such costs to the affected programs, and (2) reapply the approved rate(s) to the appropriate base to identify the proper amount of indirect costs allocable to these programs.

BY THE INSTITUTION:

Missouri Department of Health & Senior Services

Pat Bedell
Deputy Director of Administration

DATE: 3-19-18

ON BEHALF OF THE FEDERAL GOVERNMENT:

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Darryl W. Mayes - S

Arif Karim
Director, Cost Allocation Services

DATE: 3/9/2018

Wanda Rayfield

Telephone: (214) 767-3261

Page 3 of 3
SCSEP Operation

1. Recruitment:

The Missouri SCSEP sub-grantees continue to engage in outreach to potential participants in historically underserved minority communities. The types of strategies employed by each SCSEP sub-grantee to recruit participants from minority populations are largely dependent upon the geographic area. Current sub-grantees have strong community relations and are skilled in outreach and recruitment efforts. Sub-grantees will continue to engage in outreach to potential minority participants in ways that have proven successful such as participating at health fairs, speaking at community events, networking with community and faith-based leaders, and by participating in job fairs, senior expos, and multi-cultural events.

DSDS developed and distributed outreach materials such as posters, flyers, and brochures to the sub-grantees who in turn distribute them to venues that older individuals from racially and ethnically diverse populations visit. DSDS and the sub-grantees also distribute the materials at widely attended venues such as Senior Day at the Missouri State Fair, the Missouri Institute on Minority Aging Conference, and the Bringing It Together event for seniors. The SCSEP State Coordinator and sub-grantees will continue to update recruitment materials to appeal to the broadest possible audience of potentially eligible participants. Materials can be customized and presented in other languages as specific populations are identified whose primary language is other than English. Additionally, the Missouri Office of Minority Health distributes outreach
materials at job fairs, health fairs, churches, food pantries, social service agencies, and other events intended to reach seniors.

In addition to the existing strategies, sub-grantees keep abreast of any new social organizations and agencies that serve seniors. Flyers, applications, and brochures are given to these agencies to help recruit participants. Newspapers or newsletters that focus on minority groups are evaluated for advertisement. Community churches in areas that have a high population of minorities often have newsletters or other publications that offer an opportunity to advertise SCSEP. Case managers continually recruit new host agency sites that will support the goals of SCSEP participants, ensuring that the host agencies are accessible to the participants and are supportive of the participants’ needs.

Sub-grantees maintain a strong working relationship with their local job centers, senior centers, and community partners and keep them informed and updated on the program. In addition, the State SCSEP Grantee provides information about the program to DSDS staff to share with the seniors they serve.

2. Income Eligibility

Participant’s family income cannot be more than 125 percent of the Federal Poverty Level for the participant to participate in the SCSEP program. Participants with a disability may choose to be treated as a “family of one” for income eligibility determination purposes.

Participant income eligibility and employment status are verified at the time of initial application and at least once every twelve months after that as part of the participant’s recertification. Income eligibility and other participant records are kept in the participant’s file.
and are locked away to allow access to only those that have a legitimate need to review the information.

3. Orientation

Orientation is provided to both participants and host agencies when they begin their participation in the program. Orientation to participants includes, at a minimum, information on project goals and objectives, community service assignments, training opportunities, available supportive services, the availability of a free annual physical exam, participant rights and responsibilities, the grievance process, permitted and prohibited political activities, and proper completion and submission of participant timesheets.

Orientation with host agencies includes, at a minimum, information on the project goals and objectives, participant rights and responsibilities, host agency rights and responsibilities, worker safety, training on completing monthly supervisor reports regarding participant’s progress, the grievance process, and proper completion and submission of participant timesheets.

4. Durational Limits

Participant and host agencies are informed of the maximum participant program participation of forty-eight months at their entrance to the program and on a regular basis after that. Missouri SCSEP has a durational limit policy that allows participants to request to remain in the program one additional year if they meet two of the waiver factors. The Missouri SCSEP State Coordinator determines the appropriateness of an individual remaining in the program for an additional year based on the likelihood of the additional time helping the participant to become
employed or self-sufficient.

If participants reach thirty-six months in the program, the sub-grantee and participants start planning their transition out of the program. They continue to develop a plan and resources as the durational limit approaches to help the participant reach unsubsidized employment or transition to other support services to assist them with being self-sufficient.

5. Assessments

When a participant enters the SCSEP, they complete an initial assessment with the sub-grantee to review the participant’s work history, skills and interests, talents, physical capabilities, aptitudes, need for supportive services, occupational preferences, training needs, the potential for performing community service assignments, and the potential for the participant to transition to unsubsidized employment. This assessment is used to create an Individual Employment Plan (IEP). The IEP is a roadmap for the participant and sub-grantee to follow to help the participant overcome the barriers to employment and to be successful in finding unsubsidized employment or in transitioning to other supportive services.

Assessments are completed as often as needed after the participant begins the program, but no less frequently than two times per twelve-month period.

6. Community Service Assignment

The participant’s completed IEP is used to determine an appropriate placement. The decision on which host agency to place a participant in is based on the desired skills and training the participant wants and/or needs to reach their employment goals, proximity to the participant’s home, and if the placement will be a good fit for the participant and host agency.
Participants spend an average of twenty hours per week in their host agency assignment.

Host agencies are selected based on the training opportunities and supervision they can provide program participants. Host agency development is an ongoing process by the sub-grantees to ensure that participants have appropriate options for placement to meet their desired outcomes.

Missouri SCSEP has not utilized participants in the administration of the project; however, sub-grantees have utilized participants in helping run their local projects.

Host agency assigned staff supervises community service assignments. The host agency supervisor helps train the participant on the duties they will be doing at the host agency and provides feedback on the progress of the participant to the sub-grantees.

7. Training

While in the host agency assignment the participant is given tasks to help them build the skills they need to prepare for unsubsidized employment that meets their goals. Examples of the types of training provided by host agencies include, but are not limited to:

- office and receptionist skills such as using computers, using different software programs, answering phones, interacting with the public, working on soft skills, and operating various office machines;
- working in retail settings such as thrift shops helps develop the skills of running a cash register, product merchandising, and working with the public;
- working in senior centers helps develop skills such as working in a commercial kitchen, preparing activities for seniors, answering phones, and working with the public; and,
• working in local food banks helps build the skills of sorting products and preparing them for distribution, working with the public, and helping food pantry participants complete paperwork.

Training outside of the host agency can be as beneficial as the training provided by the host agency. Participants are regularly referred to their local job center for trainings available such as completing a resume, interviewing tips, and working with different software programs such as Microsoft Office, Excel, PowerPoint, etc. Participants are also referred to local libraries, community centers, community action agencies and other social service agencies that provide free or low-cost training opportunities that would benefit the participants. The Sub-grantee in Area E offers financial management classes to SCSEP participants and invites participants to attend any of the trainings provided by their workforce development team.

8. Supportive Services

Participants are continually being assessed for barriers that keep them from attaining unsubsidized employment. When barriers are identified participants are provided, or referred to another agency to provide, supportive services to help them successfully participate in the program. Supportive services include, but not limited to the payment of reasonable costs of transportation; health and medical services; special job-related or personal counseling; incidentals such as work shoes, badges, uniforms, eyeglasses, and tools; dependent care; housing, including temporary shelter; needs-related payments; and follow-up services.

Once a participant successfully transitions to unsubsidized employment, follow-up services continue for approximately one year. These services include making contact with the
participant to determine if they have the necessary supportive services to remain on the job and
to provide, or arrange to provide, such services, if feasible.

9. Termination

Participants are provided with a written copy of termination policies at the time of
enrollment. In addition, participants receive a verbal explanation of the termination policy and
procedures. Participants may be terminated from the program under the following
circumstances:

(a) It is determined that the participant was incorrectly declared eligible as a result of false
information knowingly given by that individual.

(b) During eligibility verification, it is discovered that a participant is no longer eligible for
enrollment.

(c) It is incorrectly determined that a participant is eligible for the program through no
fault of the participant.

(d) If the participant refuses to accept a reasonable number of job offers or referrals to
unsubsidized employment consistent with the IEP and there are no extenuating
circumstances that would hinder the participant from moving to unsubsidized
employment.

For any termination, participants must be given thirty days written notice prior to the
termination that explains the reason(s) for termination. When an unfavorable determination of
enrollment eligibility is made, or a participant is terminated for cause, the sub-grantee refers the
individual to other potential sources of assistance, such as the One-Stop Delivery System.
Any termination, as described in this section, must be consistent with administrative guidelines issued by the Department of Labor and the termination notice must inform the participant of the grantee’s grievance procedure. All terminations are subject to the applicable grievance procedures.

10. Complaints and Grievances

Participants with complaints and grievances will be directed to follow the grievance procedures outlined in the Missouri SCSEP Operations Policy handbook. This policy can be reviewed in Attachment F.

11. Maximizing Enrollment

Missouri SCSEP sub-grantees comply with equitable distribution (ED) and ensure that positions are filled in the counties in which they are authorized to the extent practicable, notwithstanding variations resulting from modified positions. The SCSEP State Grantee will work with the national grantees and Missouri SCSEP sub-grantees to ensure that positions are maximized while managing over-enrollment to minimize the impact on participants and avoid program disruptions or reductions in hours.

Service to Minorities (Older Americans Act, Title V, Section 515)

The Missouri Senior Community Services Employment Program (SCSEP) has shown an increase of 6.28 percent in the overall enrollment of minorities from PY2016, when minority enrollment was 39.8 percent of the enrolled participants, to PY2017, when minority enrollment was 42.3 percent of the enrolled participants. According to the American Community Survey of
2012-2016, the minority population in Missouri is 17.88 percent of the total population of Missouri. In each of the core performance measures contained in the PY2016 SCSEP Minority Report, Missouri SCSEP equitably served both the minority and majority populations.

Persons identifying as being an ethnic minority is recorded in SPARQ and reports are generated from the Participant/Host Agency (PHA) database. This report is accessed through the Quarterly Progress Report, which confirms that eligible minority participants are equitably served and placed. The strategies described in the PY2018 grant application continue to allow Missouri to surpass the expected levels of enrollment for minority participants.

The SCSEP State Coordinator is housed within the Department of Health and Senior Services (DHSS) along with the Office of Minority Health. This allows regular communication regarding strategies to target outreach to traditionally underserved minorities, including seniors, with the goal of offering improved opportunities and well-being through equitable access to health programs and other services.

The sub-grantee in Area E is committed to addressing the barriers that are faced by the minority populations in the counties they serve. Minority populations represent a variety of racial and ethnic backgrounds, some of whom are limited English speakers. Supportive service plans address the barriers to employment faced by each participant. Service plans will assist participants in locating resources to help them overcome barriers such as non-English language speaking, lack of transportation, and lack of or inadequate housing.

The Sub-grantee in Area E has a strong working relationship with organizations that specialize in assisting minorities and immigrant families. Targeted recruitment for SCSEP is
focused on the counties with authorized positions and the minority populations represented in those counties. Community partners that assist a large number of minorities and immigrants such as Guadalupe Senior Center and Don Bosco Senior Center assist by posting flyers and providing information in their local publications in the Kansas City metropolitan area. These community partners are also host agencies, which reassures potential participants of the program’s purpose and commitment to the participants.

Once a person with limited English language enters the program, translator services are provided for the enrollment process and on-going training, as needed. The main strategy for the sub-grantees to successfully recruit minority participants is partnering with agencies that provide social services directly or indirectly to these potential participants. In most cases, these agencies are also potential community service host agencies for SCSEP, as mentioned above. Host agencies have a good understanding of the program and can share this information with their clients/customers.

The Sub-grantee in Area DF and Area G partners with Parkway Adult Education and the International Institute to ensure foreign-born participants in their English as a Second Language classes are aware of SCSEP. Bilingual International Assistant Services, or BIAS, serves individuals from almost thirty nationalities and is a valuable outreach partner for finding potential participants that are minorities. The Urban League of St. Louis and the Kingdom House in St. Louis are two examples of SCSEP community service sites that offer increased program exposure to potential minority participants.

The following steps will be continued or expanded as they have led to an increase in participation of under-served minorities in Missouri:
- Develop an effective Individual Employment Plan with each participant;
- Develop a training assignment that matches each participant’s job goal;
- Develop/enhance skills through training at community service assignments and through online skill-based training;
- Work readiness training will be provided one-on-one or in a group setting to suit the needs of the participant;
- Sub-grantee staff will work with participants one-on-one to assist them in finding and applying for available jobs in their local communities;
- Assist participants to locate resources to help them overcome barriers to employment, including lack transportation, poor work history, criminal backgrounds, etc.
- Recruit businesses in areas with a large proportion of minority residents for host agency placement and employment opportunities; and
- Assist participants with resume writing, online applications, interviewing skills, and networking with local area businesses.

Even with the success of the previously described approaches in serving minority populations, there are social and economic barriers unique to individual applicants that must be addressed to ensure all participants have the opportunity to participate in and fully benefit from SCSEP. Sub-grantees are experienced in helping participants explore resources to overcome these barriers to achieve success.

To achieve parity of access for all eligible applicants, the Missouri SCSEP will continue to ensure that eligible seniors in minority populations are aware of the availability of supported employment services. The Missouri SCSEP Grantee will continue providing technical assistance and feedback to the sub-grantees to maintain the level of enrollment of eligible minority populations.
Organizational Structure

The Missouri SCSEP is administered by the Department of Health and Senior Services (DHSS), the Division of Senior and Disability Services (DSDS), in the Bureau of Senior Programs (BSP). BSP staff members are responsible for specific areas of the program (See Attachment A, Organizational Chart). The BSP Bureau Chief is the Title V SCSEP State Coordinator and also supervises the programmatic staff members that support the program. As the SCSEP State Coordinator, the Bureau Chief is responsible for the coordination and development of the Title V state plan and the annual grant. He is responsible for conducting meetings with sub-grantees and providing technical assistance while tracking performance. The Bureau Chief also attends statewide meetings with various agencies and organizations that focus on employment and workforce development. In January 2015, the Bureau Chief was appointed to the Missouri Statewide Workforce Investment Board as the representative for the Department of Health and Senior Services.

The Aging Program Specialist II (APSII) duties include reviewing the annual and durational limits and IEPs, completing data validation and assisting with annual on-site monitoring, writing and updating program policies, providing technical assistance regarding SPARQ, assisting with the development of the SCSEP State Plan and updates as well as the annual grant, and notifying the Missouri SCSEP sub-grantees of the availability of new supportive services that may be of interest to the SCSEP participants.

The Fiscal and Administrative Manager provides fiscal support to ensure the budgeted funds for each sub-grantee contract are being expended appropriately.
The Administrative Office Assistant coordinates the annual survey processes and enters the findings on spreadsheets for program staff to analyze.

The grant allocation for personnel for PY2018 is fifteen percent for the SCSEP State Coordinator, twenty-eight percent for the Aging Program Specialist II, two percent for the Fiscal and Administrative Manager, and 5 percent for the Administrative Office Assistant.

**Sub-Grantees**

The DHSS utilizes a competitive bid process to contract with sub-grantees, who in turn administer the program for the State of Missouri. The current sub-grantees for the Missouri SCSEP PY2018 and their assigned counties and authorized positions can be found in Attachment B.

The sub-grantee in Area DF and Area G is a nonprofit corporation that has 98 years of experience providing vocational assessment and placement services for people with disabilities and disadvantages. The agency is a significant provider of vocational rehabilitation services in Missouri. Revenue from their thrift stores assists with funding the agency's employment and training programs. Other funding sources are through contract services, employment and training, sheltered workshop, and contributions.

The Sub-grantee in Area E is a nonprofit organization whose mission is to help older individuals gain skills and confidence to better their lives. The subgrantee has over 48 years’ experience in providing job skill training, job search assistance, and job placement to those 55 years and older, unemployed and looking for employment. Supports are derived through the AARP, U.S. Department of Labor ETA, US. Department of Treasury- IRS, U.S. Department of Justice, Corporation for National and Community Service, U.S. Department of Agriculture, Robert
Wood Johnson Foundation, Toyota, The John A. Hartford Foundation, United HealthCare, FINRA, Commonwealth Foundation, SCAN Foundation, Visa, and from engaging the community in providing social services and advocacy.

If new sub-grantees are selected to serve in the state, the State SCSEP Grantee has included requirements in the Request for Applications that the new sub-grantee must meet to transfer the participants successfully with no interruption to their services. This includes the new sub-grantee ensuring that they have sufficient staff to provide transition services and their readiness to take over the participants once the contract starts. The sub-grantee must have access to the SPARQ database and be authorized to enter data. The sub-grantee must have Memorandums of Understanding (MOU’s) in place with Missouri Job Centers, Area Agencies on Aging in their areas and with the National SCSEP contractors in their areas. In addition, the sub-grantee should establish cooperative relationships or MOU’s with Workforce Development Boards in the awarded service area, Vocational Rehabilitation programs, local service programs for veterans, local training programs, and local social service programs which target seniors.

**Monitoring and Audits**

The SCSEP State Coordinator is responsible for assuring the sub-grantees receive all policy, program, technical assistance, and regulatory updates to effectively and efficiently administer the program in their respective areas. The SCSEP State Coordinator communicates regularly with the sub-grantees to ensure program updates are implemented throughout the service areas and that performance measure expectations are met. These meetings are an opportunity to provide technical assistance, provide information on performance objectives,
develop strategies to facilitate success within the program and provide support for continued successful program performance. The SCSEP State Coordinator conducts on-site monitoring of each sub-grantee annually. The monitoring review includes but is not limited to local office operations and procedures for eligibility, enrollment, orientation, as well as a review of office records for staff, participants, and host agencies.

The sub-grantees are required to submit monthly reports of agency activities detailing outreach efforts for the SCSEP State Grantee to track progress towards performance measures. Any sub-grantee failing to meet the required performance measures is provided technical assistance.

Oversight and monitoring of sub-grantees promote good management and leadership and assists grantees in clarifying objectives. This, in turn, promotes continuous improvement in program operations and in meeting performance measures established by the Department of Labor (DOL).
## Areas Served/Positions Authorized PY2018

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<th>Authorized Positions</th>
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<th>Authorized Positions</th>
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Missouri SCSEP Subgrantee AREA DF and G
MERS GOODWILL
2545 S. Hanley Road
St. Louis MO 63144

Beth Brown, Assistant Vice President of Program Services
888-651-4177
bbrown@mersgoodwill.org

Don Vaisvil, Director of SCSEP Services
314-647-7453
dvaisvil@mersgoodwill.org

Madge Witt
Case Manager

Constance McCord
Case Manager

Bridget Jones
Case Manager
PROGRAMMATIC ASSURANCES FOR PY 2018 FUNDS

You must certify that you will conform to these assurances throughout the period of the grant by checking each of the assurances below. These assurances apply fully to any sub-recipient, local project, or grantee staff involved in the delivery of services.

You agree to:

**Recruitment and Selection of Participants**
- Develop and implement methods to recruit and select eligible participants to assure maximum participation in the program.
- Use income definitions and income inclusions and exclusions for SCSEP eligibility as described in TEGL No. 12-06 (https://www.doleta.gov/directives/crr_doc.cfm?DOCN=2291), to determine and document participant eligibility.
- Develop and implement methods to recruit minority populations to ensure at least proportional representation in your assigned service area as listed in the latest Minority Report.
- Develop and implement strategies to recruit applicants who have priority of service as defined in OAA section 518(b)(1)-(2) and by the Jobs for Veterans Act (JVA) as amended.

Individuals with priority are those who:
- Are covered persons in accordance with the JVA (covered persons who are SCSEP-eligible must receive services instead of or before all non-covered persons);
- Are 65 years or older;
- Have a disability;
- Have limited English proficiency;
- Have low literacy skills;
- Reside in a rural area;
- Have low employment prospects;
- Have failed to find employment after utilizing services provided under Title 1 of WIOA;
- Are homeless or are at risk for homelessness.

**Assessment**
- Assess participants at least twice per 12-month period, and more frequently if appropriate.
- Use assessment information to determine the most appropriate community service assignments (CSAs) for participants.

**Individual Employment Plan (IEP)**
- Establish an initial goal of unsubsidized employment for all participants.
- Update the IEP at least as frequently as assessments occur (at least twice per 12-month period).
- Modify the IEP as necessary to reflect other approaches to self-sufficiency, if it becomes clear that unsubsidized employment is not feasible.
- For participants who will reach the individual durational limit or would not otherwise achieve unsubsidized employment, include a provision in the IEP to reflect other approaches to self-sufficiency, transition to other services or programs.
ATACHMENT C

✓ Rotate participants to a new host agency (or a different assignment within the host agency) based on a rotation policy approved by DOL in the grant agreement but only when an individualized determination determines that the rotation is in the best interest of the participant. Such rotation must further the acquisition of skills listed in the IEP.

Community Service Assignment (CSA)
✓ Base the initial CSA on the assessment done at enrollment.
✓ Select only designated 501(c)(3) organizations or public agencies as host agencies.
✓ Put in place procedures to ensure adequate supervision of participants at host agencies.
✓ Ensure safe and healthy working conditions at the CSA through annual monitoring of the host agency site and annual safety consultation with the participant at the host agency site.

Recertification of Participants
✓ Recertify the income eligibility of each participant at least once every 12 months, or more frequently if circumstances warrant.

Physical Examinations
✓ Offer physical examinations to participants upon program entry, and each year thereafter, as a benefit of enrollment.
✓ Obtain a written waiver from each participant who declines a physical examination.
✓ Not obtain a copy or use the results of the physical examination to establish eligibility or for any other purpose.

Host Agencies
✓ Develop and implement methods for recruiting new host agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
✓ Comply with maintenance of effort: Ensure that CSAs do not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals who are not SCSEP participants. You must specifically ensure that CSAs do not:
  ✓ Displace currently-employed workers (including partial displacement, such as a reduction in non-overtime work, wages, or employment benefits).
  ✓ Impair existing contracts or result in the substitution of Federal funds for other funds in connection with work that would otherwise be performed.
  ✓ Assign or continue to assign a participant to perform the same work, or substantially the same work, as that performed by an individual who is on layoff.

Orientation
✓ Provide orientations for its participants and host agencies, including information on:
  ✓ Project goals and objectives
  ✓ Participant rights and responsibilities
  ✓ Community Service Assignments
  ✓ Opportunities for paid training outside the CSA
  ✓ Available supportive services
  ✓ Availability of free physical examinations

C-2
✓ Local staff must address the topics listed above and provide additional orientation to participants on:
  ✓ SCSEP goals and objectives
  ✓ Grantee and local project roles, policies, and procedures
  ✓ Holiday and sick leave
  ✓ Assessment process
  ✓ Development and implementation of IEPs
  ✓ Evaluation of participant progress
  ✓ Health and safety issues related to each participant's assignment
  ✓ Role of supervisors and host agencies
  ✓ Maximum individual duration policy, including the possibility of an extension, if applicable, and the documentation required to support an extension
  ✓ Termination policy
  ✓ Grievance procedure

Wages
✓ Provide participants with the highest applicable required wage (highest of Federal, state, or local minimum wage for the most nearly comparable covered employment or minimum age under the Fair Labor Standards Act of 1938, or the prevailing rate of pay for persons employed in similar public occupations by the same employer) for time spent in orientation, training, and community service assignments.

Participant Benefits
✓ Provide workers' compensation, other benefits required by state or Federal law (such as unemployment insurance), and the costs of physical examinations.
✓ Provide compensation for scheduled work hours during which the participant's host agency is closed for Federal holidays, which may be paid or in the form of rescheduled work time, and establish written policies related to this compensation.
✓ Establish written policies relating to approved breaks in participation and any necessary sick leave that is not part of an accumulated sick leave program.
✓ Not use grant funds to pay the cost of pension benefits, annual leave, accumulated sick leave, or bonuses.

Procedures for Payroll and Workers' Compensation
✓ Make all required payments for participant payroll and pay workers' compensation premiums on a timely basis.
✓ Ensure that host agencies do not pay workers' compensation costs for participants.

Duration Limits
Maximum Average Project Duration - 37 Months
✓ Maintain average project duration of 27 months or less, unless ETA approves an extension to 36 months.

Maximum Individual Participant Duration - 48 Months
✓ Allow participants to participate in the program no longer than 48 months (whether or not consecutively), unless your approved policy allows for an extension and the participant meets the extension criteria.
ATTACHMENT C

✓ Notify participants of your policy pertaining to the maximum duration requirement, including the possibility of an extension if applicable, at the time of enrollment and each year thereafter, and whenever ETA has approved a change of policy.
✓ Provide 30-day written notice to participants prior to durational limit exit from the program.

Transition Services
✓ Develop a system to transition participants to unsubsidized employment or other assistance before each participant's maximum enrollment duration has expired.
✓ Begin transition planning for participants who will exit for durational limit at least 3-6 months prior to their exit date.

Termination Policies
✓ Provide a 30-day written notice for all involuntary terminations that states the reason for termination and informs the participants of grievance procedures and rights to appeal.
✓ Maintain written termination policies in effect and provide to participants at enrollment for:
  ✓ Provision of false eligibility information by the participant
  ✓ Incorrect initial eligibility determination at enrollment
  ✓ Income ineligibility determined at recertification
  ✓ Participant has reached individual durational limit
  ✓ Participant has become employed while enrolled
  ✓ IEP-related termination
  ✓ Cause (must be approved by ETA prior to implementation)

Equitable Distribution (ED)
✓ Comply with the equitable distribution plan for each state in which the grantee operates and only make changes in the location of authorized positions within a state in accordance with the state ED plan and with prior ETA approval.
✓ Comply with the authorized position allocations/ED listed at www.sccened.org.
✓ Collaborate with all grantees authorized to serve in a state in which you operate to achieve compliance with authorized positions while minimizing disruption to the participants.

Over-Enrollment
✓ Manage over-enrollment to minimize impact on participants and avoid layoffs.

Administrative Systems
✓ Ensure representation at all ETA-sponsored required grantee meetings.
✓ Communicate grant policy, data collection, and performance developments and directives to staff, sub-recipients, and local project operators on a regular basis.
✓ Develop a written monitoring tool that lists items you will review during monitoring visits, and provide this tool to sub-recipients and local project operators.
✓ Develop an annual monitoring schedule, unless the FPO approves a different standard; notify sub-recipients and local project operators of monitoring plans; and monitor sub-recipients and local project operators on a regular basis.
✓ Develop and provide training to increase sub-recipients' and local project operators' skills, knowledge, and abilities.
When appropriate, prescribe corrective action and follow-up procedures for sub-recipients and local project operators to ensure that identified problems are remedied.

Monitor the financial systems and expenditures, including sub-recipients and local project operators on a regular basis to ensure compliance with cost allocations as specified in the regulations.

Ensure that sub-recipients and local project operators receive adequate resources to effectively operate local projects.

Train sub-recipients and local project operators on SCSEP financial requirements to help them effectively manage their own expenditures, and provide general financial training as needed.

Ensure that all financial reports are accurate and submit them in a timely manner, as required.

Ensure full implementation and monitoring of requirements for customer satisfaction surveys, including participant, host agency and employer surveys.

Develop a written plan for both disaster response and recovery so that the project may continue to operate and provide services under emergency circumstances.

Collaboration and Leveraged Resources

Collaborate with other organizations to maximize opportunities for participants to obtain workforce development, education, and supportive services to help them move into unsubsidized employment. These organizations may include but are not limited to: workforce investment boards, American Job Centers, vocational rehabilitation providers, disability networks, basic education and literacy providers, and community colleges.

Supportive Services

Provide supportive services, as needed, to help participants participate in their community service assignment and to obtain and retain unsubsidized employment.

Establish criteria to assess the need for supportive services and to determine when participants will receive supportive services, including after obtaining unsubsidized employment.

Sub-Recipient Selection (If Applicable)

In selecting sub-recipients in areas with a substantial population of individuals with barriers to employment, national grantees will give special consideration to organizations with demonstrated expertise in serving individuals with barriers to employment (including former recipients of national grants), as defined in the statute.

Complaint Resolution

Establish and use written grievance procedures for complaint resolution for applicants, employees, sub-recipients, and participants.

Provide applicants, employees, sub-recipients, and participants with a copy of the grievance policy and procedures.

C-5
Maintenance of Files and Privacy Information

✓ Maintain participant files for three program years after the program year in which the participant received his/her final follow-up activity.
✓ Ensure that all participant records are securely stored by grantee or sub-recipient and access is limited to appropriate staff in order to safeguard personal identifying information.
✓ Ensure that all participant medical records are securely stored by grantee or sub-recipient separately from all other participant records and access is limited to authorized staff for authorized purposes.
✓ Establish safeguards to preclude tampering with electronic media, e.g., personal identification numbers (PINs) and SPARQ or other data system logins.
✓ Ensure that the ETA/SCSEP national office is immediately notified by grantee in the event of any potential security breach of personal identifying information, whether electronic files, paper files, or equipment are involved.
✓ Comply with and ensure that authorized users under its grant comply with all SPARQ and other data system access and security rules.

Documentation

✓ Maintain all documentation required for compliance with record retention rule set forth in the first bullet of the prior section, Maintenance of Files and Privacy Information.
✓ Maintain documentation of waivers of physical examinations by participant.
✓ Maintain documentation of the provision of complaint procedures to participants.
✓ Maintain documentation of eligibility determinations and re-certifications.
✓ Maintain documentation of terminations and reasons for termination.
✓ Maintain records of grievances and outcomes.
✓ Maintain records required for data validation.
✓ Maintain documentation of monitoring reports for sub-recipients and host agencies.

Data Collection and Reporting

✓ Ensure the collection and reporting of all SCSEP required data according to specified time schedules.
✓ Ensure the use of the OMB-approved SCSEP data collection forms and the SCSEP internet data collection and evaluation system, SPARQ, or the successor data system as designated by DOL.
✓ Ensure at the grantee or sub-recipient level that those capturing and recording data are familiar with the latest instructions for data collection, including ETA administrative issuances, e.g., TEGIs, Data Collection and Data Validation Handbooks, and the Older Worker Community of Practice.
✓ Ensure data are entered directly into the WDCS/SPARQ, or the successor data system as designated by DOL.
✓ Legally obligate sub-recipients to turn over complete data files in the specified electronic format, as well as hard copy case files, to the grantee when sub-recipients cease to administer SCSEP.
✓ Legally obligate new sub-recipients to collect and enter complete data related to any participants whom they acquire upon becoming sub-recipients, including any participants who are still in the follow-up period.
If the grantee is not in compliance with any of the assurances above, the grantee must provide information on a separate attachment indicating what specific steps the grantee is taking to conform to these standard grant requirement(s).

By signing below, I certify that my organization will comply with each of the listed requirements and will remain in compliance for the program year for which we are submitting this application.

[Signature]
Signature of Authorized Representative

[Date]
JUL 26 2018

C-7
## SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM

### Summary of PY 2018 Goals and Targets

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