



STATE OF TENNESSEE

PHIL BREDESEN
GOVERNOR

July 1, 2008

Employment and Training Administration
Advisory System
U.S. Department of Labor
Washington, DC 20210

To Whom It May Concern:

As Governor of the State of Tennessee, I hereby delegate to The Honorable James G. Neeley, Commissioner of the Tennessee Department of Labor and Workforce Development, the responsibility for developing and submitting the State Senior Employment Services Coordination Plan.

In this capacity, Commissioner Neeley will be acting on my behalf

Warmest regards,

A handwritten signature in black ink that reads "Phil Bredesen".

Phil Bredesen

PB:bm

DESIGNEE:
The Honorable James G. Neeley, Commissioner
Department of Labor and Workforce Development

State Capitol, Nashville, Tennessee 37243-0001
Telephone No. (615) 741-2001



**TENNESSEE SENIOR
EMPLOYMENT SERVICES
STATE PLAN
July 1, 2008**

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TENNESSEE SENIOR EMPLOYMENT SERVICES STATE PLAN

Overview of The Older Americans Act Amendments of 2006 and The Senior Community Services Employment Program

The Older Americans Act is the major vehicle for the organization and delivery of supportive and nutrition services to older persons. The act authors funding for programs including: the Senior Community Services Employment Program (SCSEP), Meals on Wheels, elder abuse prevention activities, and a new National Family Caregiver Support Program. Reauthorization of the Older Americans Act (OAA Amendments) was signed into law on November 13, 2006, and it brought significant changes to SCSEP.

SCSEP, administered by the U.S. Department of Labor, is the only federally-sponsored, job creation program targeted to low-income older Americans. The program subsidizes part-time community service jobs for low-income persons age 55 years and older who have poor employment prospects. Across the nation each year, approximately 100,000 older persons work in a variety of community service jobs; this includes working as nurse's aides, teacher's aides, librarians, clerical workers and day care assistants. Clearly, SCSEP benefits not only its participants but also the communities in which it serves.

The U.S. Department of Labor allocates funds to operate the program to State Units on Aging and two national organizations. SCSEP grantees are represented on state and local business-led boards (Workforce Investment Boards) that provide strategic planning and oversight of workforce development activities established under the Workforce Investment Act of 1998 (WIA).

As the baby-boom generation ages, the demand for employment and training services, as well as income support for low-income older persons will, substantially increase. The Urban Institute projects that there will be 1.4 million more disadvantaged adults over the age of 55 in the year 2005 than there were in 1995. Low-income seniors generally must continue working, which puts added strain on workforce investment resources and on the One-Stop system. This provides a single point of contact for job seekers and employers seeking information about local workforce development activities. The OAA Amendments require improved integration with WIA. This integration will not only support SCSEP reforms but will also help the workforce investment system prepare for a greater number of older workers it will serve outside of SCSEP. One-Stops can benefit from the experience SCSEP has gained in serving this population.

SCSEP provisions of the OAA Amendments are designed to:

- Enhance employment and training opportunities for seniors by reinforcing connections with the broader workforce system
- Establish an enhanced performance accountability system to hold each grantee accountable for attaining quality levels of performance with respect to core measures (such as most in need and placement in unsubsidized employment)
- Improve the ability of states to coordinate services by providing for the broad participation of stakeholders in the development of an annual plan. This ensures an equitable distribution of projects within the state.
- Strengthen administrative procedures by incorporating fiscal accountability provisions similar to the Workforce Investment Act. This includes definitions of administrative and programmatic costs and the application of uniform cost principles.
- Revise the distribution of funding.

SENIOR EMPLOYMENT SERVICES STATE PLAN

Background

The Older Americans Act Amendments of 2000 contains a new provision requiring each state's governor to submit a State Senior Employment Services Coordination Plan (the State Plan). The purpose of this plan is to improve coordination between organizations that can be engaged in older worker activities and to enhance employment services for older workers. The plan is to serve as a guide for Senior Community Service Employment Program operators as they prepare their plans for their activities within the state.

TENNESSEE SENIOR EMPLOYMENT SERVICES STATE PLAN

Section 1. Purpose of the State Plan

The processes used by the Tennessee Department of Labor and Workforce Development (TDLWD) to insure proper participation of those interested in the developments of the Tennessee Senior Employment Services Coordination Plan are:

- The draft plan was posted on the Tennessee Department of Labor and Workforce Development Internet Web site at www.tennessee.gov/labor-wfd
- The Tennessee Department of Labor and Workforce Development SCSEP Coordinator contacted each member of the SCSEP Older Worker Task Force for input. This Task Force is comprised of representatives from SCSEP grantees operating in Tennessee. This group works diligently to strengthen the coordination of SCSEP with the services for older workers in the WIA one-stop system. The Task Force also develops the goal and responds to the recommendations established in the annual state planning process.
- Email correspondence to agencies and individuals involved in older worker activities.
- Cooperating with the Tennessee Workforce Development Board
- Continuing collaboration with Disability Program Navigators (DPN) and Aging and Disability Resource Connection (ADRC). Navigators may refer eligible individuals to SCSEP which is apart of ADRC as a resource network to ensure that older individuals are aware of these programs.

Section 2. Involvement of Organizations and Individuals

The advice and recommendations of interested individuals were obtained in the following manner:

- Individuals representing (SCSEP) Grantees, from across the state, were contacted to confirm the Equitable Distribution Plan in April of 2008. In Tennessee, the U.S. Department of Labor allocated funds (to operate SCSEP) to the Tennessee Department of Labor and Workforce Development and to two national organizations. These national organizations are National Council on Aging and Senior Service America. All of the representatives contacted concurred with the ED Report and agreed that the State Plan has improved coordination between organizations serving older workers and has enhanced awareness of their unique needs. Each complimented and encouraged the active continuation of the Older Worker Task Force.
- SCSEP Grantees in Tennessee submitted descriptions of current and planned WIA-related activities for inclusion in the 2008 State Plan.

- With the reauthorization of WIA, the Tennessee Department of Labor and Workforce Development plans to make the Senior Employment Services Coordination Plan part of the WIA Strategic Five Year Plan.
- Statewide, Tennessee has nine Area Agencies on Aging, Individuals in leadership is being notified by email and is asked to respond.
- Local non-profit, community-based, and government organizations across the state was contacted for input concerning the 2008 State Plan. They were United Way, Salvation Army, Goodwill Industries, Urban League, Community Action Agencies, County Economic Development Agencies, and Chambers of Commerce. These organizations were asked to recommend ways SCSEP could improve community service to further benefit the communities it serves. They were also asked how to better enhance employment and training services for older workers. As many of these organizations as possible will be contacted again in PY 2009

Section 3. Solicitation and Collection of Public Comments

The Tennessee Department of Labor and Workforce Development made the State Plan available at www.tennessee.gov/labor-wfd for public comment from June, 13, 2008, until June 27, 2008. Click on Department Information in the lower left side: then look for Senior Community Service Employment Program. No comments were submitted during the public comment period.

Section 4. Basic Distribution of SCSEP Positions Within the State

The Tennessee Senior Employment Services Coordination Plan will ensure greater coordination of SCSEP activities among grantees operating within Tennessee. It will also provide for an equitable distribution between Tennessee counties of program resources. The State Plan identifies the number and distribution of eligible persons in the State (including those with greatest economic and social need, and minorities). It also specifies employment situations and skills, and the localities and populations where community service projects are most needed. The Plan also describes methods of linking WIA activities with SCSEP.

A. Location of Positions

Title V of the Older Americans Act promotes geographical distribution of SCSEP positions so that all eligible persons have reasonable access to SCSEP. In Tennessee, the U.S. Department of Labor allocates 20% of SCSEP funding to the Tennessee Department of Labor and Workforce Development's 239 positions with the remaining 80% going to two national organizations. The national organizations are National Council on Aging (196 positions) and Senior Service America (741 positions). For fiscal year 2008 Tennessee received \$10,349,230

with 1,176 authorized positions. The unit cost used to compute the number of positions was \$8,794.

To measure the collective progress made by these grantees toward an equitable distribution of program positions, an Equitable Distribution Report was developed in April 2008. Each grantee operating in the state was contacted and asked to develop the report. Telephone conversations provided a venue for the group to affirm a return to the regular practice of annual, Equitable Distribution meetings to achieve equality as indicated in the OAA Amendments.

If necessary, Tennessee will meet with sub grantees and national grantees in order to correct eligible distribution. Additionally, state operators meet on the national level to alleviate the disproportion noted.
(See attached ED Report)

B. Rural and Urban Populations

On the attached Urban and Rural Share Report, a county-by-county listing of rural and urban populations is provided. It will become a difficult task for the state agency to persuade decision makers representing the national sponsors to move slots or relinquish them. Contractors have sub-sponsors and employees in place providing service based on the prior ED report. USDOL may have to come to the aid of the state agencies. State agency coordinators can only make suggestions and they have no authority over other sponsors.

Rural areas that have inadequate resources will have access to the WIA services. Services from WIA will include community outreach, assistance in providing transportation, career center referrals, promoting area businesses in an effort to increase host agency assignment. As of July 2008, each sub grantee holds a position on the local board. The board includes members of the community, business owners, representatives, and those from other state agencies. The sub grantee is assigned to the career center one day a week to recruit participants qualified to participate in the program. The state's objective to improve these resources is an ongoing effort.

C. Specific Population Groups

"Greatest economic need" those persons at or below 125% of the Department of Health and Human Services Poverty Level.

In Tennessee, per 2000 Census Data, individuals 55+ numbered 1,197,000 with 250,645 eligible for SCSEP services. To be eligible for SCSEP, an individual must be 55 or older and have an income of no more than 125% above federal poverty guideline. For Tennessee, 21% of the individuals 65+ fall at or below 125% of the poverty level.

As of May 30, 2008, the current Title V enrollment was 1,176. The rate at which SCSEP served individuals at or below the poverty level was 83%. (This indicates that those with the greatest economic need are being reached with the available funding.)

For SCSEP grantees, priority for selection:

Veterans and qualified spouses who are at least 60 years old.

Other individuals who are at least 65 years old.

Veterans and qualified spouses who are 55-59 years old.

Other individuals who are 55-59 years old.

These statutory preferences apply to the following individuals: 1) those that have incomes below the poverty line; 2) those who have poor employment prospects and who have the greatest social and/or economic need; and 3) those who are eligible minorities, limited English speakers, or Indians. These preferences should be considered within the context of the statutory priorities. For example, among eligible veterans and qualified spouses age 60 and over, to the extent practicable, preference should be given to individuals within these three categories.

"Greatest Social Need," as defined by the U.S. Department of Labor, means need caused by non-economic factors. This includes persons with physical disabilities and mental disabilities, language barriers, and cultural, social, or geographic isolation brought about by racial or ethnic status. In Tennessee, 13.5% of the eligible population is identified as having a disability. SCSEP served approximately 180 at the end of PY 2007. As indicated above, Tennessee SCSEP is effectively serving eligible older residents with disabilities.

Overall, recruitment endeavors in Tennessee have been successful in reaching and serving the SCSEP- targeted special populations. The use of Disability Program Navigators facilitating throughout the career center system has provided a great resource. Navigators assist individuals for special needs with career center staff in the recruitment and selection process. The Navigators Bridge the gaps between the business and human service communities by organizing forums for discussion, etc.

Section 5. Supporting Employment Opportunities for Participants

Occupation trends in Tennessee have moved from manufacturing to service. According to the Non-Agricultural Employment Report provided by the TDLWD, service-providing occupations are now leading. The overall unemployment rate for 2008 was 7.2%. For the nation, it was 6.1%.

Individuals entering the SCSEP program have low skills and meet the poverty guidelines. Skills with past employment history includes custodial, food service, lawn care, security guard and nursing home assistance. Grantees monitor host-agency work sites to ensure that both participants, and employers, needs are being met. The participant's individual employment plan that was developed at the time of enrollment will determine if the host agency has met the participant's requirements.

Participants enrolled in the Senior Community Service Employment Program will be assigned to agencies which provide services to low-income older persons, to the economically disadvantaged, and to organizations offering services which provide positive contributions to the welfare of the general community. Provision of in-home services for frail and vulnerable older Tennesseans at risk of institutionalization will be a priority. Workers also will be assigned to locate and serve isolated seniors. Disease prevention and health promotion activities for older persons are being provided by a number of agencies, and participants will be assigned to assist in these efforts whenever possible. Opportunities to serve other age groups will also be provided through placement in schools, day-care programs, health and hospital programs, and agencies serving individuals with physical and developmental disabilities.

Section 6. Increasing Participant Placement in Unsubsidized Employment and Employer Outreach

Through the assistance of employer contacts, WIA and other Aging and Disability Resource Connections will make every effort to place participants into unsubsidized employment. As stated in our SCSEP Grant agreement, at least 28% of the funded slots will be placed in full time employment. Sub-grantees will continue to contact employers in their specific areas to increase employment opportunities. Industries that will be contacted will include those providing opportunities for engineering, information technology, manufacturing, healthcare, other industries and occupations critical to the success of the regional economy.

SCSEP will make every effort to establish rapport with those employers which have reliable career pathways and who are willing to develop and maintain a working partnership. Strategies to transition participants into unsubsidized employment will include the following. Job development will be an on-going process and will consist of scheduled, employer visits in the public and private sectors of telephone contacts, and of using local news media. Cooperative arrangements will be made through the assistance of local Career Centers of the Tennessee Department of Labor and Workforce Development, local manpower agencies, community service work-based training assignment agencies and public and private employers. Coordination and co-location of services at the career centers will identify suitable job openings in high-demand occupations.

SCSEP will contact the local Department of Economic Development and the Regional Chamber of Commerce to assist in creating job opportunities in local growth industries for SCSEP participants. SCSEP will also encourage local employers to participate in job fairs, and meetings to learn how older workers contribute to all aspects of our economy and to America's leadership in the world marketplace.

Retention activities after a participant have entered the workforce the first quarter after exiting the program. Then, sub grantees contact the employer to follow-up on a participant's working status. Once the participant's status has been identified the, 2nd retention phase begins. The 2nd follow-up is completed six months after the first quarter of exit and then the last follow-up is completed one year after the first quarter of exit (Quarter definition in SCSEP Data Collection Handbook pg. 15 topic 12.)

Strategies to transition participants into unsubsidized employment will include the following: Job development will be an on-going process and will consist of scheduled employer visits in the public and private sectors, telephone contacts, and utilization of local news media. Cooperative arrangements will be made through the assistance of the local Career Centers of the Tennessee Department of Labor and Workforce Development, local manpower agencies, community service work-based training assignment agencies, public and private employers. Coordination and co-location of services at the career centers will allow identification of suitable job openings in high demand occupations.

The state will provide additional training through WIA resources. The resources include: basic learning skills, upgrading computer skills, enrollment with WIA for Vocational Education, resume writing and assistance with full time job placement.

Section 7. Community Service Needs

Tennessee's rural areas cover Middle, West, and East Tennessee with approximately 55% of the senior population residing in these areas. Rural area employers with SCSEP training include: custodial, food service, lawn care, department store greeters, librarian assistant's and child care providers. In order to develop the types of jobs listed above, the sub-grantees will make connections with businesses, local employers, schools, child care facilities, nursing homes and healthcare facilities. After rapport has been established with these entities, host agencies will be established. Sub-grantees will maintain a relationship in an effort to supply host agencies with SCSEP participants as needed. This state agency's experience indicates counties, with a high measure of poverty among its residents, also lack resources for community service endeavors similar to those authorized under SCSEP. Therefore, Tennessee grantees will use 2000 Census Data to identify counties with the greatest percentage of people at or below poverty. At the upcoming Equitable Distribution meetings this year, each grantee operating in these targeted counties will be asked to provide documentation that all SCSEP positions, available in these particularly vulnerable counties, are being utilized.

Also, the Quarterly Progress Report indicators include the number of SCSEP persons served along with the demographics and characteristics of those participants. This U.S. Department of Labor, required report, is another way to track the number served, the distribution, the employment situation, and the population where community service projects are located.

Section 8. Coordination with Other Programs, Initiatives and Entities

WIA requires SCSEP grantees to be a partner in each local one-stop system and to enter into a Memorandum of Understanding, describing how services will be provided, with the Local Workforce Investment Board. In Tennessee, the U.S. Department of Labor allocates funds (to operate SCSEP) to the Tennessee Department of Labor and Workforce Development (TDLWD) and to two national organizations. The national organizations are National Council on Aging, and Senior Service of America. Tennessee is divided into thirteen Local Workforce Investment Areas (LWIAs). There are fifteen one-stop Career Centers across the state providing comprehensive, workforce development-related activities, including job placement services for older workers.

TDLWD leads an older worker task force comprised of representatives from SCSEP grantees operating in Tennessee. Its purpose is to strengthen the coordination between SCSEP and the services for older workers in the WIA one-stop system, as well as to continue addressing goals established in the annual state planning process.

SCSEP Project Directors represent the Title V Program on each of the Local Workforce Investment Boards (LWIBs). The cooperation of grantees on local boards and on the task force has resulted in improved coordination between workforce agencies and reduced turfism.

SCSEP is currently collaborating with The Tennessee Commission on Aging and Disabilities, the Aging and Disability Resource Connection (ADRC). ADRC serves older persons, adults with disabilities and caregivers in assisting individuals in finding answers to questions about long term care and links to a wide range of home and community based services. Senior Services Incorporated, Employment Guide Job Fair and Maturity Matters Job Fair will continue to seek mature workers and employers for older workers. Last year's Maturity Matters Job Fair attracted nearly 1,000 job seekers and 40 employers. Other partnerships will include nonprofits geared to homeless veterans and disabled seniors. SCSEP will encourage sub-grantees to contribute to the efforts of the aging network. SCSEP sub-grantees will regularly communicate with SCSEP State Coordinators, provide progress reports, participate in state meetings, assist with the state SCSEP Coordination Plan, assist with equitable distribution, and publicize SCSEP. Tennessee did not receive a WIRED grant. However, South Central Tennessee Workforce Board is collaborating with Alabama (recipient) and Georgia in WIRED.

The Department of Labor and Workforce Development's Title V Coordinator surveyed each grantee to learn the level of coordination among the grantees and what their recommendations for improvement would be. Their responses varied. They are grouped and listed in this plan in Section 10.

Section 9. Avoidance of Disruptions in Service

Where there is a need to transfer participants, the TDLWD's Project Directors will provide written notice to the participant and to the new grantee. All essential records will be transferred to the new grantee within a reasonable period. Every effort will be

made to ensure that there is no disruption in service so that no participant will lose wages or benefits as a result of the transition. To ease the transition, participants will be encouraged to take advantage of other assistance programs available. Onsite help will be available as needed. Since necessary financial information will be transferred, there should be no interruption in payroll. Final payroll payments will be made according to a payment schedule agreed upon by the two grantee agencies.

Section 10. Improvement of SCSEP Services

While, in many respects, the Senior Community Service Employment Program is working smoothly throughout the state, there are opportunities for improvement. These opportunities include:

- Requiring SCSEP national contractors operating in Tennessee to send a representative, with decision-making authority, to the annual equitable distribution meeting.
- Requiring all one-stop center staff to be trained in the aging process and in communicating with older workers.
- Ensuring that all SCSEP enrollees have access to all one-stop center services.
- Ensuring that one-stop staff provide referrals to all agencies which can provide services to older workers.
- Ensuring that the SCSEP program is not the only employment program available to older workers.
- Collecting data from one-stop centers on the number of persons age 55 and older seeking assistance from the one-stops and collecting the number who are successful getting training or an unsubsidized job.
- Developing by SCSEP and the one-stop centers a cooperative outreach strategy so that older persons, needing training and employment services, are aware of the options available to them.
- Achieving an equitable distribution in Tennessee, the U.S. Department of Labor came to the aid of (TDLWD). This can be accomplished by the Department mandating that national contractors operating in the state submit a report in writing prior to the ED meeting. This report should describe what they are willing to do to alleviate under-and-over served situations associated with their allocation of positions (2000 census). The state agency has no authority and can only make suggestions.
- Developing recruitment and marketing plans to attract individuals of Asian and Hispanic origins.

- Consulting with the state agency’s federal representative to better define and secure data to measure “greatest social need” for improved analysis of this special population.
- Consulting with the state agency’s federal representative concerning general matters.
- Requesting partnership meetings-- SCSEP Project Directors of the state agency and national sponsors will approach LWIA entities statewide and will request participation in career center partner meetings. Also, periodic in-service training for mandated partners will likely enhance referrals.

Section 11. Appendices

- Copy of Equitable Distribution Report
- Public comments- No comments were received
- Letters of attestation of participation

SCSEP Equitable Distribution Four Year Plan

Please fill in the number of PY 2008 authorized positions by county for Tennessee and for each national grantee within the state. Totals and differences will calculate automatically. Save the file and return a copy **by e-mail** to hostetter.phil@dol.gov no later than the due date for your State Plans in early spring of 2008.

County	Distribution Factor	Equitable Share	State	NCOA	Senior Service America	Totals	Difference
Anderson County, TN	0.0121	14			14	14	0
Bedford County, TN	0.0080	9			9	9	0
Benton County, TN	0.0043	5			7	7	2
Bledsoe County, TN	0.0034	4			4	4	0
Blount County, TN	0.0165	20			19	19	-1
Bradley County, TN	0.0151	18			18	18	0
Campbell County, TN	0.0130	15	15			15	0
Cannon County, TN	0.0030	4		4		4	0
Carroll County, TN	0.0083	10			10	10	0
Carter County, TN	0.0163	19	6		11	17	-2
Cheatham County, TN	0.0040	5	5			5	0
Chester County, TN	0.0031	4	4			4	0
Claiborne County, TN	0.0093	11	10			10	-1
Clay County, TN	0.0031	4			4	4	0
Cocke County, TN	0.0098	12			11	11	-1
Coffee County, TN	0.0110	13			10	10	-3
Crockett County, TN	0.0046	5			5	5	0
Cumberland County, TN	0.0118	14	7		7	14	0
Davidson County, TN	0.0670	80		81		81	1
Decatur County, TN	0.0043	5			5	5	0
DeKalb County, TN	0.0049	6		5		5	-1
Dickson County, TN	0.0060	7		9		9	2
Dyer County, TN	0.0086	10	3		8	11	1
Fayette County, TN	0.0060	7			7	7	0
Fentress County, TN	0.0064	8	7			7	-1

Franklin County, TN	0.0077	9			7	7	-2
Gibson County, TN	0.0130	15			15	15	0
Giles County, TN	0.0066	8			8	8	0
Grainger County, TN	0.0063	8			7	7	-1
Greene County, TN	0.0158	19			19	19	0
Grundy County, TN	0.0053	6			6	6	0
Hamblen County, TN	0.0117	14			14	14	0
Hamilton County, TN	0.0484	58			57	57	-1
Hancock County, TN	0.0032	4			4	4	0
Hardeman County, TN	0.0077	9	9			9	0
Hardin County, TN	0.0082	10	10			10	0
Hawkins County, TN	0.0128	15			15	15	0
Haywood County, TN	0.0057	7			7	7	0
Henderson County, TN	0.0057	7			7	7	0
Henry County, TN	0.0081	10	5		5	10	0
Hickman County, TN	0.0047	6		4		4	-2
Houston County, TN	0.0028	3	3			3	0
Humphreys County, TN	0.0035	4	4			4	0
Jackson County, TN	0.0036	4	0		3	3	-1
Jefferson County, TN	0.0083	10			10	10	0
Johnson County, TN	0.0066	8	7			7	-1
Knox County, TN	0.0515	61			60	60	-1
Lake County, TN	0.0027	3			3	3	0
Lauderdale County, TN	0.0081	10			10	10	0
Lawrence County, TN	0.0092	11			7	7	-4
Lewis County, TN	0.0028	3			3	3	0
Lincoln County, TN	0.0082	10			10	10	0
Loudon County, TN	0.0067	8			8	8	0
Macon County, TN	0.0056	7	2	3		5	-2
Madison County, TN	0.0150	18			18	18	0
Marion County, TN	0.0062	7			7	7	0

Marshall County, TN	0.0047	6			6	6	0
Maury County, TN	0.0109	13			13	13	0
Mc Minn County, TN	0.0126	15			15	15	0
Mc Nairy County, TN	0.0083	10	10			10	0
Meigs County, TN	0.0028	3			3	3	0
Monroe County, TN	0.0101	12			12	12	0
Montgomery County, TN	0.0121	15	5	9		14	-1
Moore County, TN	0.0013	2			2	2	0
Morgan County, TN	0.0046	6	6			6	0
Obion County, TN	0.0080	9	3		8	11	2
Overton County, TN	0.0066	8			8	8	0
Perry County, TN	0.0025	3			3	3	0
Pickett County, TN	0.0018	2			2	2	0
Polk County, TN	0.0047	6			5	5	-1
Putnam County, TN	0.0124	15	7		8	15	0
Rhea County, TN	0.0078	9			9	9	0
Roane County, TN	0.0128	15			15	15	0
Robertson County, TN	0.0077	9		12		12	3
Rutherford County, TN	0.0151	18		17		17	-1
Scott County, TN	0.0058	7	7			7	0
Sequatchie County, TN	0.0025	3			3	3	0
Sevier County, TN	0.0116	14			14	14	0
Shelby County, TN	0.1198	145	66		84	150	5
Smith County, TN	0.0038	5		7		7	2
Stewart County, TN	0.0031	4	4			4	0
Sullivan County, TN	0.0323	38	9		29	38	0
Sumner County, TN	0.0154	19		15		15	-4
Tipton County, TN	0.0076	9			9	9	0
Trousdale County, TN	0.0022	3		3		3	0
Unicoi County, TN	0.0048	6			6	6	0
Union County, TN	0.0053	6	5			5	-1

Van Buren County, TN	0.0017	2	2			2	0
Warren County, TN	0.0096	12		8		8	-4
Washington County, TN	0.0202	24	10		14	24	0
Wayne County, TN	0.0046	5			5	5	0
Weakley County, TN	0.0080	9	8		2	10	1
White County, TN	0.0065	8			7	7	-1
Williamson County, TN	0.0082	10		9		9	-1
Wilson County, TN	0.0089	11		10		10	-1
TOTALS:	1.0000	1197	239	196	741	1176	-21



June 27, 2008

Mr. Louis Stone
SCSEP Coordinator
Tennessee Department of Labor & Workforce Development
Andrew Johnson Tower, 1st Floor
710 James Robertson Parkway
Nashville, TN 37243-0658

Dear Mr. Stone:

The National Council on Aging, a SCSEP national grantee serving seniors in middle Tennessee, appreciates the opportunity to review and comment on the Tennessee Senior Employment Services State Plan.

Upon review of the Plan, we recommend a change under Section 4, Item C. Specific Population Group:

To be eligible for SCSEP, an individual must be 65 or older and have an income of no more than 25% above federal poverty guidelines.

Recommendation: change 65 to 55

We appreciate the good working relationship with the Tennessee Department of Labor and Workforce Development and look forward to strengthening this partnership in order to improve the lives of Tennessee seniors in the upcoming year.

Sincerely,

A handwritten signature in cursive script that reads "Brenda S. Head".

Brenda S. Head,
SCSEP Project Director
National Council on Aging, Inc.

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Anthony R. Sarmiento
President and Executive Director

June 26, 2008

Mr. Louis Stone
SCSEP Coordinator
Tennessee Department of Labor and Workforce Development
Andrew Johnson Tower, 1st Floor
710 James Robertson Parkway
Nashville, TN 37243-0658

Via email and USPS (Signed Copy)

Dear Mr. Stone:

On behalf of Senior Service America, Inc, a SCSEP national grantee serving participants in the state of Tennessee, we thank you for the opportunity to review and comment on the Tennessee Senior Employment Services State Plan. During the planning process, the Tennessee Department of Labor and Workforce Development facilitated participation by all SCSEP grantees in the state, and SSAI appreciated the opportunity to engage in the process. We are especially proud the collaborative work that led both to the positive handling of Equitable Distribution and the strategic vision for the planning process.

While the Plan as written provides a strategic overview for SCSEP in Tennessee, we recommend inserting the following in the Overview Section:

Goal

The Tennessee Department of Labor and Workforce Development recognizes the goal of the Senior Community Service Employment Program to be of a dual nature, as conveyed in the Older Americans Act Amendments of 2006, Section 516, Sense of Congress. SCSEP's mission is to:

- *Enable older low-income job seekers to develop the skills and self-confidence to obtain unsubsidized jobs and become financially self-sufficient; and to*

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- *Provide valuable community service at on-the-job training sites for SCSEP participants, as a means to improve participants' self-sufficiency, to provide meaningful civic engagement, and to strengthen the communities.*

We look forward to continuing to partner in Tennessee with the Department of Labor and Workforce Development in order to offer SCSEP participants the very best service possible.

Sincerely,

Marta Ames
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