NEBRASKA

Senior Community Service Employment Program

State Plan 2012 - 2015

Submitted By:

Nebraska Department of Health & Human Services
Division of Medicaid & Long-Term Care
State Unit on Aging

Modified November 2014

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Governor's Designation of State SCSEP

Strategic Workforce Planning

Section 1

Nebraska Vision

Nebraska's vision for the years ahead must be about preparing Nebraska to compete in the 21st Century, in an age of technological marvels, new educational challenges, international competition and entrepreneurial opportunity.

The Nebraska Department of Labor shared that the Governor's policy initiative, *Growing State Economies,* includes six drivers and 12 actions for economic growth:

The six drivers are:

1.	Entrepreneurs	individuals who seed, grow and renew business
2.	Education and Skills	the concentration of highly educated, skilled individuals within economies
3.	Innovation and Technology	new ideas and technologies that enter the economy and change what is produced, how it is produced, and the way production itself is organized
4.	Private Capital	the sufficiency and availability of debt and equity financing at all states of company formation
5.	Global Markets and	businesses competing successfully in global markets
6.	Industry Clusters	firms embedded in regional clusters supported by institutions providing education, training, finance, and marketing services

The 12 actions include:

1.	Create a competitive tax and regulatory environment
2.	Put entrepreneurial activity at the top of the state's economic goals
3.	Distinguish among different kinds of entrepreneurs and businesses and target policies and resources accordingly
4.	Cast a wide net to find entrepreneurs
5.	Teach entrepreneurship skills and attitudes at all education levels
6	Build a startup environment and culture
7.	Find the potential high-growth companies and help them grow
8.	Get your entrepreneurs to give back
9.	Help companies open doors to new customer — globally and locally
10.	Reward strong ties among universities, companies, and entrepreneurs
11.	Encourage entrepreneurs and companies, small and large, to build innovation clusters
12.	Build ecosystems, not programs

The State Department of Labor published offers the state's top 10 occupations that have above average job prospects. Occupations addressing our aging population's long term care support needs are prominently featured.

2010 — 2022 Occupational Projections Top 10 Most Annual Openings for Postsecondary Non-degree Award Education Level with Entry Wages from the Occupational Employment Statistics Survey

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Entry Wage
29-2061	Licensed Practical and Licensed Vocational Nurses	293	$16.06
31-1014	Nursing Assistants	459	$10.26
31-9092	Medical Assistants	147	$11.45
39-5012	Hairdressers, Hairstylists, and Cosmetologists	142	$8.17
47-2111	Electricians	155	$13.94
47-2152	Plumbers, Pipefitters, and Steamfitters	132	$15.28
51-4041	Machinists	144	$12.17
51-4121	Welders, Cutters, Solderers, and Brazers	153	$12.86
53-3032	Heavy and Tractor-Trailer Truck Drivers	920	$13.82
53-3033	Light Truck or Delivery Services Drivers	105	$8.96

Nebraska Department of Labor, Office of Labor Market Information 2010 — 2022 Long Term Occupational Projections and the Occupational Employment Statistics Survey updated to second quarter 2014

The State Department of Labor notes that the most common job vacancies are for Production, Office and Administrative Support, Sales and Related, Transportation and Material Moving and Food Preparation and Serving Related occupations. Some of the most common job vacancies, such as office and administrative support, match the interest of some women over 55 years of age seeking employment. The Senior Community Service Employment Program's (SCSEP) host agencies provide the location and the skills training to support participants' development of job skills for meeting their goal of locating a position in the workforce. Office work and food service are the most common types of training opportunities offered through Nebraska's host agencies.

Host agency training may need further supplementation by SCSEP the sub-grantee and the Workforce Investment Act (WIA) partners to provide local employers with job-ready employees. The office jobs currently available require a working knowledge of computers. This technological experience is often underdeveloped by persons over 55 years of age. Computer skill-building classes are offered to participants of the Senior Employment Program through a job-certified training developed by Omaha's Workforce Investment Board (WIB).

Section 2 State Operational Plan

The State Operational Plan will discuss how the Senior Community Services Employment Program functions as part of a State-wide workforce development program to address the needs of older job-seekers and employers. This section will include a brief overview of this older worker initiative. It will also include a discussion of SCSEP coordination with community service organizations, employment training programs and employers. This document was made available for Public Comment from November 4, 2014 to November 17, 2014. Comments received are located on page 18 of this document.

Section 2.1 Purpose of the State Plan

Nebraska's State Plan describes the Senior Community Service Employment Program (SCSEP) and the training opportunities which prepare older workers for the jobs available in Nebraska's workforce.

This initiative provides training for aging workers through community service organizations (host agencies). Common training locations are provided at schools, hospitals and senior service organizations. Nebraska's SCSEP programs have a working relationship with a wide variety of community organizations. These include local non-profits, senior service organizations, senior centers and local Area Agencies on Aging. Additional partnerships have been formed with supporting employment training organizations such as One-Stops and the Workforce Investment Boards and local employers. Once completed, a partnership will also include Nebraska's Aging and Disabilities Resources Center.

Communication is vital for Nebraska's SCSEP. Program adjustments (due to revised regulations, processes, program performance measures or employment niches for older workers) may be required for substantial changes in program operations. These developments are discussed with Nebraska's project sponsors during regular contacts or as needs arise.

Under SCSEP, project sponsors receive grants to create and pay for part-time (usually 20 hours a week) community service positions for low-income persons over 55 years of age at local public or private nonprofit organizations. The program has a dual purpose to provide useful community service assignments for the enrollees while promoting transition to unsubsidized employment. Local public and private nonprofit organizations which provide training opportunities also benefit through the work completed by SCSEP enrollees.

The goals for the Senior Community Services Employment Program mirror the goals in the Nebraska Workforce System Plan which includes:

Specific goals for Nebraska's Workforce System include:

1. build strong, effective relationships with employers
2. create opportunities for stakeholders in Nebraska's Workforce System to collaborate and find solutions to workforce issues

3. expand the use of technology as a way to communicate, collaborate, and streamline services
4. implement innovative approaches to deliver employment and training services to Nebraskans
5. build Nebraska's reputation as one of great job opportunities for all members of the workforce
6. collaborate with statewide initiatives such as Forging Nebraska's Future, the Entrepreneur Acceleration Program, InternNE, and the Industry Councils, to be a part of innovative workforce solutions

Use of Funds

Each enrollee is offered a minimum of at least a 20 hour work week. Enrollees placed in part-time community service employment receive a wage not less than what is established by the Federal Minimum Wage Law and receive fringe benefits. Host agencies, private nonprofit employers, and public employers provide skill training through subsidized part-time employment in the fields of social services, recreational activities, library services, legal services, health care, education, economic development, conservation, maintenance and restoration of natural resources, community beautification, and other services within communities. A host agency must be a governmental or nonprofit, nonpartisan organization. Examples of host agencies include schools, senior centers, food banks, housing authorities, libraries, community foundations and health agencies.

Participant Eligibility

Eligible individuals are at least 55 years of age, and have an income not greater than 125 percent of the poverty level, or are a member of a family that receives regular cash public benefit payments. Income eligibility must be certified annually. All participants must reside within Nebraska. There is no minimum period of residency for determining eligibility. Grantees may not impose additional eligibility requirements beyond those imposed by federal law. The enrollment priorities for filling vacant authorized positions are as follows:

1. Veterans and qualified spouses.
2. Individuals with the greatest economic need (incomes at or below the poverty level).
3. Those 65 years of age or older.
4. Those seeking re-enrollment following termination of a job through no fault of their own due to illness or engaging in unsubsidized employment, provided that re-enrollment is sought within one year of termination.
5. Individuals with limited English proficiency.
6. Anyone with a disability.

7. Those with low employment prospects.

8. Those at-risk of homelessness.

9. Individuals that live in rural areas.

Section 2.2 **Organizational Participation**

The development of Nebraska's Senior Community Employment Program State Plan involved the insight and participation of a variety of interested persons and groups. This planning process involved multiple steps and opportunities for various opinions to impact the initial plan. A brief summary includes:

1. State Title V Agency developed the framework and initial draft of State Plan.
2. Nebraska's Title V program includes Experience Works which operates in 82 counties. Experience Works recruits, locates community service training and helps program participants locate unsubsidized jobs.
3. State Department of Labor and Workforce Investment Agencies provide job-search and work-skills development. The Department of Labor collaborates with the Departments of Economic Development and Education to develop a strategic approach to developing a local workforce with the skills needed for current jobs as well as future opportunities. The Department of Labor provides a wide variety of support services for job seekers. Their workforce development activities include job-training for adults. Some SCSEP participants receive additional training through this program.
4. Workforce Investment Agencies are regional agencies which work with schools, employers and other training partners to provide necessary skills training for persons seeking employment. Nebraska's Senior Community Service Employment Programs are active partners in the WIA's One Stop Shops. Some SCSEP participants also benefit from training opportunities available through the WIA's adult training programs.
5. Area Agencies on Aging provide a wide variety of support services to help persons over 60 years of age live independently within their communities. SCSEP participants often have significant constraints limiting their ability to find and keep a job. Addressing factors such as affordable housing, transportation and caregiver support are necessary also. Their familiarity with community supports makes Area Agencies on Aging important partners for Nebraska's Senior Community Service Employment Programs.
6. Community service organizations provide training to SCSEP participants. These organizations range from senior service organizations such as senior centers to community services including schools and hospitals.

7. Nebraska's State Plan was posted on the Nebraska Department Health & Human Services web site www.dhhs.ne.gov/aging. Input received during the comment period has been included in the Plan.

Section 2.3 **Summary of Comments**

Nebraska's Senior Community Service Employment Program Plan for 2012-2015 was modified and published for comment from November 4, 2014 through November 17, 2014. The Plan was placed on the State Unit on Aging's web-site www.dhhs.ne.gov/aging and e-mailed to the Nebraska Department of Labor, Workforce Investment Agency partners, Area Agencies on Aging, Senior Center Associations and community service, labor, and business organizations. A Public Notice regarding availability of this plan and a request for comments was also published in the Omaha World Herald on November 7, 2014. Comments were received through November 17, 2014 and located on page 18 of this document.

Section 2.4 **Distribution of SCSEP Positions**

The Nebraska Equitable Distribution Report provides a basis for determining a fair allocation of program positions with the State. This report is useful for determining where to locate new positions, fill vacant positions, or reduce positions, as necessary. The Nebraska Equitable Distribution Report is contained in Appendix A

The distribution of Nebraska's SCSEP positions has supported the rural counties. Until the last few years Douglas County, which includes Omaha, had substantially fewer positions than were equitable. During this period, Experience Works shifted a number of their positions into Douglas County. Future Equitable Distribution discussions will focus upon the adequacy of position distribution within the urban and rural counties.

Nebraska Demographics

According to the Nebraska Department of Labor, two-thirds of Nebraska's counties are not included in a Metropolitan Statistical Area (MSA) or a Micropolitan Statistical Area (MC). According to the U.S. Department of Agriculture, Economic Research Service, in 2012, there were 49,969 farms covering 92.2% of Nebraska. Yet, according to the Bureau of Economic Analysis, only 3.9% of Nebraskans were employed in the Agriculture industry in 2012.

Twenty-eight of Nebraska's 93 counties are either part of the Omaha, Lincoln, or Grand Island MSA, or are part of a MC. 10.45% of Nebraska's employees worked in Manufacturing, 7.73% worked in Accommodation and Food Services, and around 5% worked in government. The top employing industries in Nebraska are Health Care and Social Assistance, Retail Trade, Manufacturing, Education Services, Accommodation and Food Services, Finance and Insurance and Public Administration. The top industries with the highest number of job openings are very similar, with Health Care and Social Assistance, Retail Trade, Administrative and Waste Services, and Manufacturing topping the list.

Source: Nebraska Department of Labor, Labor Market Information, Quarterly Census of Employment and Wages
Job Source: Nebraska Department of Labor Online advertised jobs data

According to the US Census, Nebraska's population of those 55 years of age or above represents 483,905 individuals or 26.1% of the state's population. According to the US Census, Nebraska's population of those 65 years of age or above represents 256,607 individuals or 13.8% of the state's population. The first of the baby boom generation reached 65 years of age in 2011. The population over 65 will increase dramatically over the next 15 years as baby boomers continue to age.

Special Populations

The Older Americans Act requires this program provide priority in enrollment for eligible individuals who are veterans or spouses of veterans, those with greatest economic need, individuals who are minorities, and individuals with greatest social need, individuals who failed to find employment using available WIA services, individuals who are homeless or at-risk of homelessness and those living in rural areas.

Greatest Economic Need

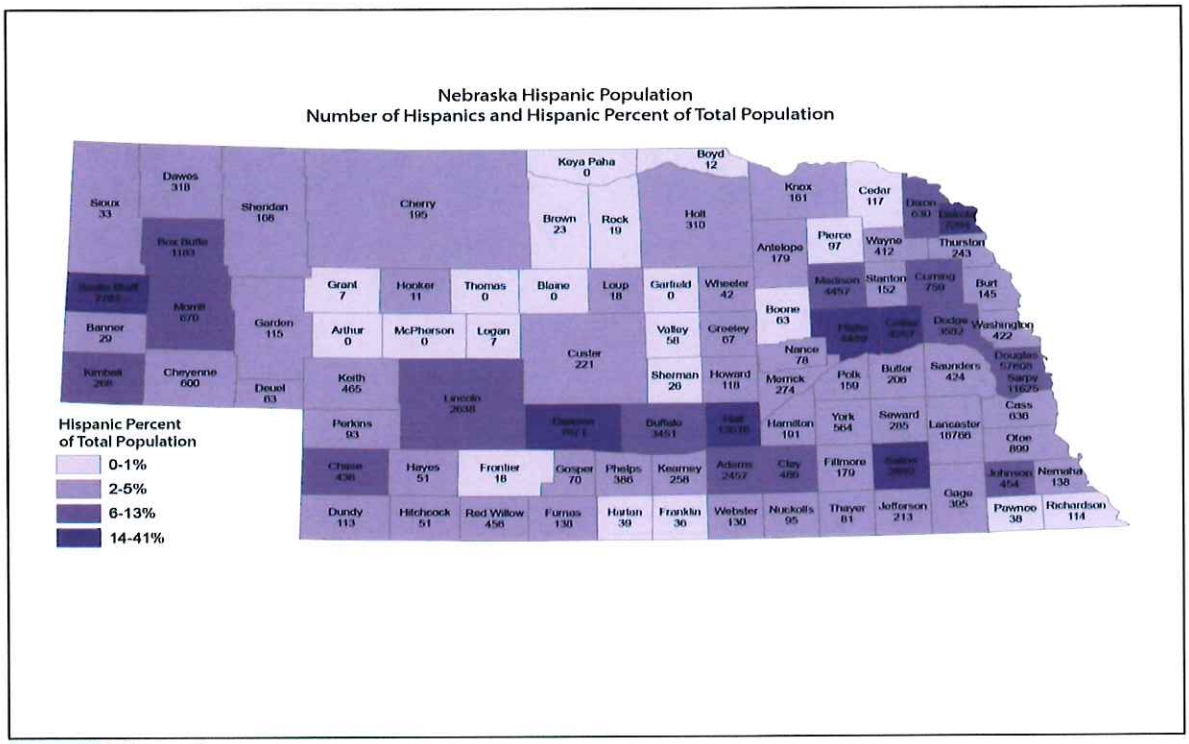
The term greatest economic need is defined as persons at or below the poverty level established by the US Department of Health & Human Services. Nebraska's population over sixty years of age includes 25,755 with incomes below the poverty level.

Source: U.S. Census Bureau, 2011-2013 3-year American Community Survey.

Minorities

According to the U.S. Census, there were about 15,672 Native Americans living in Nebraska. Population totals for others races, according to the U.S. Census were: White: 1.6 million, Black: 85,451, Asian: 35,764, Native Hawaiian: 1,240, and Two or more Races: 35,474. There were 180,088 Hispanics or Latinos living in Nebraska. 33.9% of Whites living in Nebraska who were foreign born had become naturalized citizens. This compares with 33.7% of Blacks, 44.1% of Asians, and 26.4% of Hispanics. Hispanics were the largest category of foreign born population, at 66,901, and had the lowest rate of becoming naturalized US citizens.

For Nebraska's SCSEP, the term "minorities" includes American Indians or Alaskan Natives, Asians, Blacks or African-Americans, Hispanics or Latino Americans and Asians or Pacific Islanders. The majority of Nebraska's African-American population lives primarily in Omaha and Lincoln. The distribution of Nebraska's Hispanic population is broader with a presence in many of the smaller cities such as Norfolk, Lexington and Scottsbluff.



Source: U.S. Census Bureau
Prepared by Nebraska Department of Labor, October 2014

Greatest Social Need

The term greatest social need is defined as needs caused by non-economic factors such as physical and mental disabilities, language barriers and cultural, social, or geographic isolation, including isolation brought about by racial or ethnic status. For purposes of this plan, greatest social need is defined as persons with physical and mental disabilities who are 55 years of age or older. Nebraska's population over 55 years of age includes 117,933 persons with greatest social need.

Source: U.S. Census Bureau, 2011-2013 3-year American Community Survey B21007

Rural & Urban Populations

According to population estimates from the Census from 2010-2013, much of the State's population growth have been in its urban counties. More remote counties have lost population. Sarpy County, part of the Omaha MSA, has grown rapidly in the last few years. The 2010 Census notes that 34% of the Nebraska population over 60 years of age lives in rural areas. While bio-technology, internet commerce and transportation services are growing rapidly in the eastern cities, most of Nebraska is rural with an economy that is heavily farming and ranch dominated.

Recruitment

Enrollment priority will be given to veterans and qualified spouses, eligible individuals having the greatest economic need and eligible individuals over 65 years of age. Nebraska's grantee has a history of focusing their efforts upon older individuals both with incomes below the poverty level and those with greatest social need. The State SCSEP program provides 53% of its positions to minority individuals. Over 96% of Nebraska's grantee's enrollees have annual incomes below the poverty level. Eleven percent of these enrollees are veterans. Among program participants, 76% are receiving public assistance and 63% are at risk of homelessness. Women over the age of 55 represent 39% of the total program enrollment.

Section 2.5 Increasing Placements to Employment

Increasing the placement of trainees requires that a variety of support services be focused upon all SCSEP trainees as they approach job-ready status. This may be in the form of participation in job-clubs or specialized training through Workforce Investment Board partners. Other approaches include trial employment or on-the-job training (OJE) with potential employers. Initiatives such as Omaha Chamber of Commerce-Workforce Investment Board (WIB) job-certified training for Mutual of Omaha and Blue Cross/Blue Shield will be utilized as they become more available. Trial employment or on-the-job training opportunities will be for a limited time with the expectation of a high rate of hiring by participating employers. This strategy will support resume development, interview skills and applying on-line for area jobs.

High growth industries in Nebraska include customer service representatives (for organizations such as Pay Pal, Sitel, Mutual of Omaha and Blue Cross/Blue Shield) and entry-level health care positions. These opportunities provide a livable wage for Nebraskans and a chance for advancement in growing organizations. Office support is another opportunity which matches the interest of many persons over the age of 55; however, all of these opportunities require a working knowledge of computers which is supported by training offered through the program.

Continued success in meeting performance goals will require maintenance and further development of partnerships within Workforce Investment Board and business community. Omaha's job-certified training program will be increasingly more common throughout Nebraska. Similar efforts are necessary to fulfill the Nebraska SCSEP's goal of providing trained workers for the State's high growth industries.

Program participants who locate employment will continue to receive program support. This support will consist of regular follow-ups with former participants and their employers. The purpose of follow-ups is to address any issues and support these workers in their new jobs.

Section 2.6 Community Service Needs

The Nebraska's Five-Year Integrated Workforce (2012) plan offers that the state is 76,358 square miles which means that technology is critical in coordinating services among programs and in providing services to employers and job seekers. To enhance coordination and communication, SCSEP will partner in the plan to utilize a single case management and Management Information System. This technology is called NEworks. NEworks is a powerful online labor exchange system that integrates workforce services with job seeker and employer candidate recruitment.

In the rural areas of Nebraska, community service training opportunities are limited to local schools and government agencies. Larger towns offer broader training options which include health care and a wider range of community service organizations. Lincoln and Omaha have the widest range of community service possibilities including government offices (state, federal and local governments), hospitals (local, regional and university), to cultural centers, ethnic, minority and neighborhood organizations.

A wide variety of community service organizations provide training for program participants and have the benefits of a part-time worker. Community service needs addressed through SCSEP includes educational activities, environmental quality, health care, housing, employment assistance, cultural and recreational services, as well as senior services such as nutrition sites, outreach and referral, and transportation.

The State along with its sub-grantee will continue to discuss community service needs with the organizations addressing those needs. The opportunities created by a growing need in the health services area appears promising across the State. SCSEP participants will find opportunities as in-home or health facility care providers. These opportunities will require specialized skills development through classroom training offered by community colleges (with some preparation through on-line course work for persons living in remote areas) or on-the-job training for potential hospital maintenance workers or certified nurse assistants.

Section 2.7 Coordination with Other Programs

To meet the basic support needs outside of training for employment, provide training to match older worker's employment goals, and matching older worker's to jobs available at local employers will require coordination with a number of organizations. These organizations include human service, employment and training agencies and employers.

The inadequacy of basic supports such as housing, transportation and possible care needs of a frail spouse or parent will lower a SCSEP participant's chances of completing training, finding and keeping a job. Human service organizations such Nebraska's Aging & Disability Resource Centers, the Nebraska Department of Health and Human Services and Area Agencies on Aging will be central to addressing these basic support needs.

The Department of Health and Human Services (DHHS) offers a wide variety of supports to help maintain individuals within their community. Specific programs which address common support needs include the Social Services Block Grant, Disabled Persons and Family Support, Lifespan Respite and Medicaid Waivers. A sampling of possible support services includes: transportation, energy assistance, telephone assistance, supplemental nutrition assistance program (formerly known as food stamps), adult day care for caregivers and covering the Medicare premiums for eligible low-income beneficiaries. DHHS also coordinates the Ticket to Work program which encourages persons receiving Social Security Disability to rejoin the workforce. Ticket to Work also provides benefits counselors to help people understand whether participation impacts eligibility for other public benefits.

The local Area Agencies on Aging are familiar with the support needs of the elderly and are experienced in organizing community resources to address those needs. Nebraska has one program sub-grantee, Experience Works. Experience Works is also a national grantee whose service area covers all of Nebraska. Experience Works relies upon the staff of each of the eight Area Agencies on Aging to address non-employment support needs of SCSEP trainees.

The State had another sub-grantee, Eastern Nebraska Office on Aging, whose contract ended on June 30, 2014. All of their active participants were transferred to Experience Works. The State is in the process of issuing a Request for Proposal (RFP). Results of the RFP and selection of a new sub-grantee(s), if any, will be available by spring of 2015.

The program is also participating in the development of the Nebraska's Aging and Disability Resource Centers (ADRC). This partnership will be able to provide information to address a variety of human services as well as a referral to local agencies which provide assistance to our targeted population.

One significant barrier to employment is an inadequate availability of public transit. The State Unit on Aging has established a Senior Transportation Coalition with the substantial support from Nebraska Easter Seals and Nebraska AARP. Nebraska's efforts have focused upon the development of local coordinated transportation initiatives and regional coordinated transportation systems. Interest in this initiative has come from human service, transportation providers and State Agencies (Departments of Health and Human Services, Labor, Roads and the Public Service Commission) and indicates a continuing commitment to improve the availability and effectiveness of public transportation services.

Affordable housing is necessary to rebuild or maintain the economic life of program participants. Housing issues range from locating affordable housing to accessing community supports such as energy assistance and weatherization. Both Area Agencies on Aging and Community Action Programs are familiar with available affordable housing resources.
Program participants are often caregivers for a parent, spouse or grandchild. Nebraska's Lifespan Respite Program, Care Management Program and the Older Americans Act's Caregiver Support Program assist these caregivers. The Area Agencies on Aging are partners with the

Lifespan Respite Program. They also provide Care Management and operate Caregiver Support Programs.

This older worker initiative focuses by design on an economically at-risk population. As noted earlier, 96% of participants have incomes below the poverty level, 76% receive public assistance benefits and 63% are at-risk of homelessness. A functional partnership between SCSEP, local aging, housing and community service organizations is necessary to address multiple needs of the program's participants.

The State Unit on Aging has worked with Experience Works to maintain functional partnerships within the WIA system. Nebraska's sub-grantee is active with the local One-Stop Shops. This includes participation on Workforce Investment Boards (WIB) and their committees. The sub-grantee has current Memorandums of Understanding with the WIB. (For an example of increased access, see Section 2.5's description of the job-certified training being developed in Omaha.)

Section 2.8 Avoidance of Disruption in Service

Program adjustments may be necessary for a variety of reasons. Reasons vary from the population shift documented by a new Census to an adjustment in funds available to support this program. Modest program adjustments (such as yearly Equitable Distribution position level changes) will not have an impact on current individual enrollees. Actual program shifts would occur as participants leave the program for unsubsidized jobs or for other reasons. A decrease in program funding will also require similar action. A substantial cut in funding will require a more significant program adjustment such as a reduction in the weekly participant's training hours. All participants will continue to receive program support during a program adjustment period.

Section 2.9 Improvement of SCSEP Services

Program improvement over the next four years will increasingly focus upon growing industries, developing a closer working relationship with human service organizations, supporting employers and equitably distributing SCSEP positions across our State. Suggestions include:

1. Increase SCSEP focus upon Nebraska's "Hot Jobs." Through partnerships with other Workforce Investment Act organizations develop classroom and on-the job training to address our growth industries. Long term care will be a growth industry as our Baby Boom generation increasingly needs a variety of supportive services.

2. Develop a closer working relationship between SCSEP, Ticket to Work and the Centers for Independent Living.

3. Continue relationships between SCSEP, Nebraska's Aging Network (Aging and Disability Resource Center and Area Agencies on Aging) and the State Department of Health and Human Services to address the multiple support needs common among SCSEP participants.

4. Working with Medicaid to review program guidelines which count SCSEP training income when determining program eligibility. Current rules require interested older persons to choose between training and Medicaid.

5. Review the distribution of positions to be proportional to the eligible population of persons over 55 years of age. Distribution within rural areas will be monitored to assure equitable distribution of SCSEP positions. Shifting positions will be accomplished gradually as participants leave this program.

6. Work with SCSEP providers to assure timely reporting of participant activity into SPARQ (US Department of Labor web-based reporting system).

Appendix A SCSEP Equitable Distribution Report

The Equitable Distribution (ED) State Report form 8705A shows the number of authorized positons by county as determined by the Census data and the number of enrollments by county as determined by the data in SPARQ. The state report should include all grantees that operate in a particular state. The tables in SCSEPED provide various calculations of the variance between the authorized position and the number of current enrollments by county. Please use the table from SCSEPED.org to fill out the values below and use those calculations to answer the two questions about the variance: What is its significance; and what, if any, actions the grantees will take to come into better compliance with the equitable distribution requirements. Submit the completed report to your FPO with a copy to grants.SCSEPdocs@dol.gov.

State:

I. Summary of Variance

	Number of Counties	Percent of All Counties	Average Percentage of Variance
Under-service	4	40	27.8
Over-service	4	40	128.6
Combined Total Under- and Over-service	8	80	35.3

II. Discussion: reasons for and significance of the variance

[Please describe any significant variance and explain the possible reasons for the variance]

Since July 2014 Nebraska currently has only one sub-grantee, Experience Works. Previous sub-grantee Eastern Nebraska Office on Aging (ENOA) did not enroll from April 2014 to June 2014. Experience Works did not get staff hired for Douglas County previously covered by ENOA until October 1, 2014.

III. Plan to improve statewide ED during program year

[Please explain your plans to reduce the variance in your state during the program year.]

State will make efforts to continually improve ED during the program year through sub-grantee advertisements in the media to recruit for positions in underserved counties. Moreover, as sub-grantee gets new employee trained in Douglas County, there should be no variance.

IV. Attach copy of state ED table from SCSEPED.org.

The Equitable Distribution (ED) Grantee Table 8705B shows the number of authorized positons by county as determined by the Census data and the number of enrollments by county as determined by the data in SPARQ. The grantee report should include all states in which the grantee operates. The tables in SCSEPED.org provide various calculations of the variance between the authorized position and the number of current enrollments by county. Please use the tables from SCSEPED.org to fill out the values below and use those calculations to answer the two questions about the variance: What is its significance; and what, if any, actions the grantee will take to come into better compliance with the equitable distribution requirements. Submit the completed report to your FPO with a copy to grants.SCSEPdocs@dol.gov.

Grantee:

I. Summary of Variance

	Number of Counties	Percent of All Counties	Average Percentage of Variance
Under-service	4	40%	
Over-service	2	20%	
Combined Total Under- and Over-service			

II. Discussion: reasons for and significance of the variance

[Please describe any significant variance and explain the possible reasons for the variance]

Previous sub-grantee ENOA did not enroll from April 2014 to June 30, 2014. Current sub-grantee Experience Works did not get someone hired for Douglas County until October 1, 2014 therefore Douglas County is under-enrolled by 18 as of 10-31-14. EW staff is going through the waiting list now and should be fully enrolled by 12-31-14. State wide under enrolled is 12 out of 68 positions or 17.6% under enrolled

III. Plan to improve ED in your grant during program year

[Please explain your plans to reduce the variance in your grant during the program year.]

As sub-grantee gets new employee trained in Douglas County, there should be no variance.

Appendix B

Nebraska SCSEP Providers

Service Provider List

Service Provider	Counties Served	Contact
Experience Works	82 counties in Nebraska	Sarah Biggers Executive Director 4401 Wilson Blvd. Suite 1100 Arlington, VA 22203 705-522-7272

Appendix C **Public Comments**

Nebraska's Senior Community Service Employment Program Plan modification for 2012-2015 was published for comment from November 4, 2014 through November 17, 2014. The Plan was placed on the State Unit on Aging's web-site, www.dhhs.ne.gov/aging and e-mailed to the Nebraska Department of Labor, Workforce Investment Agency partners, Area Agencies on Aging, Senior Center Associations and community service, labor, and business organizations. A Public Notice regarding availability of this plan and a request for comments was also published in the Omaha World Herald on November 7, 2014. Comments were received through November 17, 2014 and are listed below.

On November 5, 2014, Ann Rouch, State Director of Experience Works noted that Experience Works serves 82 out of 93 counties. Reference to statewide coverage was removed on page 5 as Experience Works is currently the only sub-recipient in the state.

State of Nebraska
Senior Community Service Employment Program (SCSEP)
State Plan for PY 2012-2015

Verification of Intent

In accordance with the Older Americans Act (OAA) of 1965, as amended, the Nebraska Department of Health and Human Services hereby submits the SCSEP State Plan for PY 2012 through 2015. The Division of Medicaid & Long Term Care has been designated and given authority by the Governor of the State of Nebraska to develop and administer the SCSEP State Plan in compliance with all requirements larder Title III of the OAA as amended and reauthorized in 2006.

The SCSEP State Plan is hereby approved by Governor Dave Heineman and constitutes authorization to proceed with activities contained with the plan upon approval from the Department of Labor, Employment and Training Administration.

11-25-2014
Date

Courtney Miller
Courtney Miller, Deputy Director
Division of Medicaid & Long-Term Care
Department of Health and Human Service

I hereby respectfully submit on this 17 day of December, 2014, the Nebraska SCSEP State Plan for approval by the Department of Labor, Employment and Training Administration.

Dave Heineman
Governor, State of Nebraska