

UNITED STATES GOVERNMENT

# Memorandum

TO : Regional CAP Managers

DATE: December 5, 1966

FROM : C/D-William Bozman *Bozman*

SUBJECT: Community Employment Program Material

In order to determine which of the on-going programs presently-funded by CAP that will qualify for funding under Section 205(d) or (e), it is necessary that a careful analysis be made of those programs which seem to fall under Community Employment Program guidelines.

Attached are one copy each of the following: the latest OEO drafts of the Community Employment Programs (Nelson and Scheuer Amendments), examples of subprofessional career categories, (the category of service run by State for your region, is being forwarded under separate cover.) a checklist for reviewing possible Community Employment Programs and instructions to all analysts for completing this checklist.

No decision has been made as to whether or not delegation of the Nelson and Scheuer Amendments will occur. In any event, these drafts of the Community Employment Program will be carefully reviewed with the Department of Labor prior to implementation.

Under separate cover, we are sending sufficient copies of the enclosed documents for all CAP analysts with the exception of the runs which should be distributed to State Coordinators for assignment to the appropriate analysts.

Within the next few days the CAP Managers will be contacted to establish the date the checklists will be due back in Headquarters, and to set up a date for one person from Headquarters to visit the Regional Office to assist the analysts in completing the checklists.

If there are any questions, will you please contact Earl M. Redwine, Director, Manpower Division, OEO-CAP, ext. 3411.

Enclosures

cc: Regional Directors



## INSTRUCTIONS FOR COMPLETING THE COMMUNITY EMPLOYMENT PROGRAM

### CHECKLIST

Carefully read the Community Employment Program guideline drafts and the examples of subprofessional career categories.

The computer run being sent under separate cover, is the category of service run by States for your Region. Examples of those programs which are possible Community Employment Programs are marked with checks. Those marked "pending" represent both refunding applications and new programs.

It is assumed that many of these programs could qualify under the Community Employment Program guidelines with some restructuring of program elements. At this time, it is suggested that the analyst should merely report on the programs and should not contact communities to begin the restructuring process.

No subprofessional employed by the CAA to do outreach; intake or community organization activities will qualify for 205(d) or (e).

If the CAA is training and/or employing persons for subprofessional categories similar to those listed in the CEP Job Descriptions (with the exception of those categories listed in the above paragraph) the program should be screened to determine whether or not it can qualify under 205(d).

The programs to be included in this screening process are:

1. those funded in FY '66 and FY'67 that will probably require refunding;
2. those applications that are pending; and
3. those which can be transferred to 205(d) as soon as funds are released.

Those programs checked do not include all of the programs or categories that should be reviewed. For example, very few programs have been checked off under Family Planning, Health, and Housing categories. However, it is very likely that Community Employment Programs can be identified in these categories.

The checklist enclosed must be filled out for every program which the analyst screens.

No program eligible for funding under Headstart will be eligible for funding under the Community Employment Program.

All Foster Grandparent programs funded in FY '66 are eligible for re-funding under the Community Employment Program.

All Nelson Amendment (Section 205(d)) programs funded in FY '66 or FY '67 are eligible, if they can meet the requirements set forth in the new Guidelines.

If the program is for those under 22 years of age, the program does not qualify as a Community Employment Program.

CHECKLIST FOR ALL PROGRAMS REVIEWED FOR FUNDING AS A COMMUNITY EMPLOYMENT PROGRAM

1. What is the grant number?
2. What was the last funding date?
3. Name of Agency, Project Director, address, phone number. Also denote if the agency is the CAA or the delegate agency; include the CAA name if a delegate agency is involved.
  
4. What job categories are the sub-professionals in this program being trained for?
5. How many sub-professionals are involved in this program?
6. What is the total Federal budget?
7. Of this total, how much is paying for sub-professionals involved?  
(If there are different scales or differences between salaries during and after training, please include.)
9. If the salaries are less than \$1.40 per hour, compute what the total Federal budget would be at this rate. (After January, 1968, compute on the basis of a minimum of \$1.60 per hour.)
10. Does the application include job descriptions for the sub-professionals?
11. Are the projects eligible on the basis of: the 205(d) Guidelines under:
  - a. Activities (p. 1-2)
  - b. Participants (p. 3-4)
  - c. Project Proposals. (p. 4-6)
12. Are the sub-professional classifications the same as or similar to those described in the CEP Job Descriptions?

13. Is the CAA arranging for other agencies, (a) either to employ the sub-professional after the completion of the project from non-OEO funds, or (b) provide further training?
14. Are there written assurances or agreements of such arrangements?
15. Is the employing agency making provision for creating these sub-professional jobs on a permanent basis?
16. Is there written assurance of such provisions?
17. Have the source and adequacy of the supportive services such as day care, health, legal, transportation, testing, loan funds, psychiatric counseling and housing been described?
18. Is there provision for basic education and supervised training?
19. Is the program coordinated with other funding and training resources?
20. Do you recommend the program for refunding under the Community Employment Program?  
If no, mark here \_\_\_\_\_  
If yes, mark here \_\_\_\_\_  
and briefly give your reason.
21. If the program does not qualify under the new Guidelines, can it be made to qualify?

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COMMUNITY EMPLOYMENT PROGRAM JOB DESCRIPTIONS

Examples of subprofessional career positions would include, but would not be limited to:

<u>AGENCY</u>	<u>TASK CATEGORIES</u>	<u>POSSIBLE JOB TITLES</u>
Schools	Assist Truant Officer, visit Family, Develop resources, agency referral	Attendance Developer
	Under School Nurse visit homes to teach hygiene and health improvement	Health Educator
	Assist Librarian and Teachers in working with slow readers. Conduct reading and language laboratories.	Reading Developers
	Tutorial and remedial, home visitation, personal assistance, clerical and machine operations, facility coordination	Education Assistants
	Supervise recess - physical training activities - free time supervision - physical therapy and other therapies prescribed by professionals particularly with physically handicapped children	Physical Developers
Schools Libraries	Supervise and conduct examinations and test taking. Score tests, keep records	Test Monitors
	Process books, file, stack books, keep records, clerical work, supervise craft and club activities	Library Assistants
	Operate sub-stations, book-mobiles, recruit readers	Outreach Librarian

<u>AGENCY</u>	<u>TASK CATEGORIES</u>	<u>POSSIBLE JOB TITLES</u>
Delegate Agencies of CAA's	Information giving and taking-- counsel, educate, transportation, communication, etc.	Neighborhood Worker
	Direct contact with individuals organizing community groups, liaison with professional staff, community organization	Community Developer
	Intake, interview, clerical, filing, etc., communications	Intake Clerk
Employment Service and Programs	Recruit, inform, counsel, interpret, provide liaison, assist clients in seeking services, provide intake and data gathering service, clerical and filing	Employment Worker
Public or Private Social Agencies	Temporary emergency service child and older person care, budget, hygiene, health, nutrition, etc., instruction and demonstration, family maintenance	Homemaker Service Workers
	Casework assistance, transportation, information gathering and dissemination	Neighborhood Worker
	Inform, demonstrate, instruction and assistance in procurement and utilization of surplus commodities	Commodity Utilization Developer
	Personal and Group programs designed to inform poor of services available and method of obtaining public welfare, Planned Parenthood and other service agency assistance	Information Assistant
Child Care Centers	Non-Headstart Care and training of children; supervise group activities, feeding, reading bathing, etc.	Instructors Foster Grandparents
Health	Working with health professionals in hospitals, health clinics and in homes to link services and people; provide referrals, treatment and follow-up service and/or health education	Community Health Service Worker

AGENCY

TASK CATEGORIES

POSSIBLE JOB TITLES

	Inspection Code enforcement, health education instruction and guidance	Sanitation Assistant
	Trainee position, bathing patients, taking and recording temperature, pulse, respiration, applying simple dressings, giving uncomplicated treatment, assist in treatment and examination	Nursing Assistant
	Perform simple laboratory tests, such as urinalysis, blood tests, biological skin tests; take responsibility for the care of the laboratory animals; take responsibility for the maintenance of the laboratory equipment; type blood for transfusion; perform other tasks	Laboratory Assistant
	Prepares patients for X-Ray; affixes protective lead plates; assists in the keeping of X-Ray room records; develops plates; manipulates switches	X-Ray Technician Assistant
	Prepares patients for examinations, treatment and dental surgery, and assists dentist; develops X-Ray plates, maintains instruments and equipment	Dental Aide
Mental Hospitals, Clinics	Assist with therapy, group conferences, listening, supportive assistance, liaison with professional staff	Service Workers
Courts-- Juvenile and Adult Prota- tion and Parole Officers	Direct contact with family, etc. persons to be sentenced; gather information, establish assistance, probationed parolee contact---counsel and assist and maintain contact; counsel and advise and provide service assistance to families of and prison inmates	Field Worker
Legal Services	Receiving information, evidence gathering, continuing contact with clients and/or family; communication between attorney and client	Field Worker



<u>AGENCY</u>	<u>TASK CATEGORIES</u>	<u>POSSIBLE JOB TITLE</u>
Police	Operate intake and service program, receive calls and interpret, etc.	Communications Worker
	Monitor parking areas, assist in traffic and safety work, aid in accident data gathering, record keeping and researching; education programs with schools, safety patrols	Enforcement Worker
Recreation and Social Agency	Supervise and coordinate activity programs in playgrounds, clubs, centers, etc.	Recreation Aide
Housing Authority	Operate center activity, relate professional to residents; intake and interview, keep records Housing Code enforcement	Service Worker Code Enforcement Worker
Urban Renewal	Communicate, organize, inform, provide service to relocatees, assist in finding housing, moving, settlement	Relocation Assistant
General, Private and Public, Federal State, Local Government Agencies	Indexing, filing, maintaining records, receiving and routing mail, operation of simple machines, data development	Clerical
	Operate key punch and verifying machines, tabulating cards, recording data	Cardpunch Operator
	Operate imprinting, duplicating, reproducing machines and miscellaneous work relating to office machine operation	Office Machine Operator
	Receive messages, distribute, and route simple messages, transmit simple messages	Teletypist
	Testing engineering materials conducting tests, setting up and operating laboratory equipment, assisting in report preparation	Engineering Aide
	Make work drawings, assemblies and layouts, prepare tracings, use instruments and equipment	Engineering Draftsman

AGENCY

TASK CATEGORIES

POSSIBLE JOB TITLE

Lookout, inspect public grounds for compliance, put out fires, clean burned areas, fell snags, brush, etc. Fire Control Aide

Lay out contours and making surveys, collecting soil samples, assembling information explaining conservation methods, making maps, preparing records Soil Conservation Aides

Measuring and marking, recording tree species and size, thinning, planting, pruning, enforcing rules, keeping records answering questions, etc. Forestry Aide

COMMUNITY EMPLOYMENT PROGRAM (Section 205(d))  
Nelson Amendment

In 1965, Senator Gaylord Nelson sponsored an amendment (Sec. 205(d)) to the Economic Opportunity Act which authorized the Director of OEO to make grants for special projects "...directed to the needs of those chronically unemployed poor who have poor employment prospects and are unable, because of age or otherwise, to secure appropriate employment or training assistance under other programs..." Approximately 8,000 people were employed in 123 Nelson Amendment projects in FY '66.

The new guidelines describe the types of community projects eligible for funding by OEO under the Nelson Amendment (Sec. 205(d) in FY '67 and explains how to apply for Federal assistance.

ELIGIBLE ACTIVITIES

Projects submitted for Federal assistance under the Nelson Amendment should be designed to provide meaningful work-experience and training to unemployed poor persons in activities which will improve the social and physical environment of the community.

The project will involve the unemployed and underemployed in activities that will provide training for permanent jobs. (The exception to this will be older citizens, whose primary interest in working is to supplement Social Security, Old Age Assistance and are no longer in the permanent job market.) Priority will be given to proposals that will provide services to the poor, particularly the rural and/or older poor.

Projects may include:

1. improvement and beautification of parks and open-spaces in low-income neighborhoods;

2. improvement and rehabilitation of community facilities, including those utilized for health, senior citizens, social services, and recreation.
3. maintenance, improvement and protection of forests and wildlife areas, roadside beautification, and National, State and local park facilities;
4. social, health, and educational services for the poor proposed by local communities;
5. rehabilitation of homes and centers for the aged poor; and
6. elimination of water and air pollution.

Priority will be given to projects that:

1. have been successfully operated under Section 205(d) and can qualify under the '67 guidelines;
2. provide meaningful work experience and training leading to the opportunity for permanent employment;
3. make a major impact on the physical and social environment, especially in areas of concentrated poverty;
4. provide service and/or employment opportunities for senior citizens;
5. are in a rural area or small town; and
6. priority will be given to individuals who cannot meet the requirements, or cannot complete a Section 205(e) program.
7. Any CAA that has a funded Section 205(e) program, in order to assure a referral for participants of that program who cannot complete the Section 205(e) Program.

ELIGIBLE PARTICIPANTS

Those selected to participate in Section 205(d) projects as workers must:

1. be 22 and over, preference will be given to those persons over 55; the emphasis will be on male participants (at least 50% of any program);
2. be chronically unemployed. This will be defined as being unemployed for over 15 consecutive weeks, repeatedly unemployed over the prior two years, or under-employed (less than 20 hours per week) over 26 consecutive weeks;
3. have an annual family income below the poverty line;
4. any participants of Section 205(d) that have not been placed in permanent employment through no fault of their own.
5. have no reasonable prospects for full-time employment or training assistance under other programs. (OEO will require that each applicant show what procedures it will follow to insure that no persons who have reasonable prospects for employment or acceptance by MDTA, Section 205(e), or other training programs are selected as workers in Sec. 205(d) Amendment projects.)

Applicants should not establish screening procedures or means tests for persons who are otherwise qualified by reason of employment and cash income, but they should be alert to situations where further inquiry is needed to avoid the possibility of abuse or misunderstanding.

Each application must explain how, and by whom, participants will be selected for employment in the project and what action will be taken to insure that eligibility standards will be met.

The criteria listed do not apply to supervisory staff. However, applicants are encouraged to employ chronically unemployed persons in supervisory or sub-professional jobs to the greatest extent feasible.

PROJECT PROPOSALS

1. OEO will require that, whenever feasible, CEP projects funded under Section 205(d) be located in low-income areas. The residents of the neighborhood will help to determine the nature of the project and to select the location of the project site. This should be done through an expression of opinion by the CAA neighborhood advisory council wherever possible.
2. The proposal must be submitted through the CAA where there is a CAA.
3. Each application must contain a description of what permanent employment opportunities will be available to the persons employed in the project after the expiration of the grant. Prior to renewal of grant under Section 205(d), a report must be made on the disposition of each participant on completion of the program. The grantee must justify the retention of an individual in the program for more than one year on the basis that he cannot be accepted by another training program or obtain permanent employment. Statements from the employing public or private non-profit agency, indicating their intention to consider those qualified for permanent positions over and above present employment levels, or to fill vacancies, should be included with the application.

4. Each application must also include plans for pre-employment health examinations, and medical treatment where necessary, for all those to be employed on the project. Usually, this responsibility should be assumed by the local Public Health Agency or Community Health Centers but in situations where medical examination and treatment are not available through established agencies, the cost of these services may be included in the applicant's budget.
5. A further requirement will be to describe what access to additional training opportunities in the community will be opened to individuals by completing the program, if the permanent employment does not materialize.
6. Sixty-five percent of the proposed cost will be for salaries and benefits to the poor persons employed or in training. The remaining 35% will cover cost of training, counseling, supervision, health services, material and equipment, transportation to the job site, etc.
7. All programs except those designed specifically for the aged who have permanently left the labor market must include training and/or basic education for participants to prepare them for employment or admission to further training. Expenditures for necessary fringe benefits and transportation costs to the project site may be included in project costs. Trainee transportation can be included as part of benefits to the trainees in rural areas where public transportation is unavailable.

8. Expenditures for materials and equipment to be used at the site of the project cannot be in excess of 10 percent of total project cost.
9. No program will be funded for more than \$500,000 excluding local share.
10. All grantees will be required to observe minimum fair labor practices in the operation and administration of approved projects, including:
  - a. projects must not displace regular workers; a written statement to this effect must be filed from the employing agency;
  - b. the Federal minimum wage or the prevailing local wage for comparable work, whichever is higher, must be paid;
  - c. appropriate working hours and standards must be observed for the health and safety of workers;
  - d. workmen's compensation must be provided for all employees;
  - e. vacation and holiday pay consistent with local practices is recommended;
  - f. opportunity must be provided for the trainees to become a member with full rights and privileges of any union holding or seeking a bargaining contract with the agency providing the work site;
  - g. each project application must provide for an equitable grievance procedure to protect the rights of enrollees; and each application must include a statement as to how fair labor standards will be met by the applicant.

TRAINING, COUNSELING AND EDUCATIONAL SERVICES

All programs funded under Sec. 205(d) must make specific provisions for skill training, educational assistance, and counseling



assistance, as is necessary, based on the job classification and the needs of the individual. (With the exception of the older person not in the competitive Labor Market, all individuals participating in a Community Employment Program will be assisted to qualify for further training or for permanent employment.)

Staff positions for these functions can be filled by sub-professional poor persons under the supervision of professional staff. Programs are encouraged to utilize the talents of older and retired persons possessing specialized skills either on a full-time basis or on a part-time or short-term basis.

Where the local Community Action Agency has already established facilities for outreach, intake, referral, job development and placement, basic education, and counseling operated under its own auspices or through other agencies in the community, these facilities should be utilized by the participants of the Community Employment Programs. Each project application must show how enrollees will be afforded the full range of services, available to the sponsoring CAA, or funded specifically for the project.

#### RELATIONSHIP WITH OTHER ANTI-POVERTY PROGRAMS

Projects submitted under the Nelson Amendment should be carefully developed and coordinated with other work-training and employment programs and other community betterment and beautification program, wherever feasible. Federal aid in these fields is available under the following programs:

1. CAA Comprehensive Manpower Programs (including programs providing supportive services funded under EOA, Section 205).

2. Adult Education Programs under Title VII of ESEA Act.
3. Manpower Development and Training Act (MDTA) programs, Department of Labor and Health, Education and Welfare.
4. Section 241 of MDTA, Department of Labor, HEW and Economic Development Administration - Department of Commerce.
5. Projects funded under the Highway Beautification Act, Department of Commerce.
6. The Open Space Land, Urban Renewal, Community Facilities, and Model Cities Programs in the Department of Housing and Urban Development.
7. Projects funded under the Land and Water Conservation Act of 1965, Department of the Interior.
8. Work-Experience Projects, (Title V, EOA) Department of Health, Education and Welfare and Department of Labor.

OEO will require that applicants for projects under Sec. 205(d) demonstrate in their description of the work program how the proposed project will be coordinated with ongoing programs of the types listed above, where appropriate.

Further information on these programs is contained in OEO's publication, "Catalogue of Federal Programs for Individual and Community Improvement", or from the individual Federal agencies.

#### EFFECT OF FINANCIAL GUIDELINES

Funds for 205(d) projects will be charged against the State allocations established by Section 203 of the Economic Opportunity Act.

No project may directly serve the financial interest of a profit-making organization. Projects to improve privately owned land or

buildings are ineligible, unless the land or building is dedicated to or available for public use, or are owned by persons on Welfare, Social Security, Old Age Assistance etc. or are eligible for such assistance.

MAINTENANCE OF EFFORT

Section 205(d) projects must be in addition to local and State expenditures during the previous year on community betterment and beautification, and must not merely replace them. In addition, standard CAP requirements on "increase in non-Federal expenditure" apply (see the Community Action Program Guide, Volume I, Part A, Section 5).

These requirements also apply to activities normally contracted out, as well as to those undertaken directly by the applicant. Where such activities were previously contracted out, the applicant must so state and must show that the project will not replace work previously contracted out.

WHO MAY APPLY

Any Community Agency funded under Section 204 or 205 of the Economic Opportunity Act. In localities where a CAA exists, applications will be accepted only from the CAA: other local organizations can participate, however, as "delegate agencies" of the CAA.

A delegate agency can be any other public or private non-profit organization with a concern for community betterment and beautification. State Agencies can participate through the CAA's located in the area where the job exists, or through local CAA's throughout the State.

Single Purpose Community Action Agencies (as defined in CAP Guide, Volume I, Part B, Sec. 7).

In areas where no CAA exists, any public or private non-profit organization which meets the requirements for eligible applicants contained in Volume I, Part B, Section 7 of the Community Action Program Guide may apply. Of particular importance is the requirement for participation of persons from the low-income group in an advisory capacity pursuant to Section 6.

HOW TO APPLY

Standard CAP policies and procedures as set forth in the Community Action Program Guide, Volumes I and II, and Community Action Memos, will govern applications for funding under Section 205(d).

Applications must be submitted on standard CAP application forms, available from any OEO Regional Office. For assistance in developing and preparing applications, applicants should write or call the appropriate OEO Regional Office. In preparing CAP Form 1 of the application, the brief descriptive title of the project (Item 1.6) shall include the denotation Section 205(d). In preparing CAP Form 7 of the application, the applicant must be sure to indicate clearly in the work program (Item 7.1.2) the ways in which the eligibility standards and special requirements in the Guidelines have been or will be met.

Applications must be submitted to the appropriate OEO Regional Office (See list below). In the case of applications for assistance to Indian or Migrant groups, the application should be submitted to the Special Projects Office, Community Action Program, OEO, Washington, D. C. 20506.

Headquarters  
Office of Economic Opportunity  
1200 - 19th Street, N. W.  
Washington, D. C. 20506

Office of Economic Opportunity  
Northeast Region  
40 East 41st Street  
New York, New York 10017

Office of Economic Opportunity  
Great Lakes Region  
623 South Wabash Avenue  
Chicago, Illinois 60605

Office of Economic Opportunity  
Western Region  
100 McAllister Street  
San Francisco, California 94102

Office of Economic Opportunity  
Southeast Region  
101 Marietta Street, Second Floor  
Atlanta, Georgia 30303

Office of Economic Opportunity  
North Central Region  
Pershing Building  
215 West Pershing Road  
Kansas City, Missouri 64108

Office of Economic Opportunity  
Southwest Region  
Lowich Building, Fourth Floor  
314 West 11th Street  
Austin, Texas 78701

Office of Economic Opportunity  
Mid-Atlantic Region  
Riddell Building, Fifth Floor  
1730 K Street, N. W.  
Washington, D. C. 20506

THE COMMUNITY EMPLOYMENT PROGRAM-B  
Section 205 (e) Scheuer Amendment

In order to improve services to the poor, create new kinds of sub-professional jobs, and increase the availability of public jobs to the unemployed and underemployed in the poverty areas, Congress has passed new legislation (EOA, Section 205(e)), providing funds to establish the Community Employment Program.

The CEP is designed to improve the physical, social, economic or cultural condition of the community in fields including, but not limited to, health, education, welfare, neighborhood redevelopment, and public safety by providing employment opportunities in public agencies or private non-profit organizations.

The programs will (1) assist in developing entry level employment opportunities, (2) provide opportunity for advancement and continued employment without OEO assistance, and (3) be combined with necessary educational, training, counseling, and transportation assistance, and such other supportive services as may be needed.

This program is not intended simply to provide compensated work, rather, emphasis will be on training of unemployed and underemployed poor for whom this is the most realistic and appropriate employment or job assistance opportunity. Emphasis will be upon their entry into new career-type subprofessional jobs in public service programs which offer real prospects for continuing full-time employment and the opportunity for promotions and advancement.

Projects will be established in communities with high concentration of the unemployed, where training and employing sizable numbers of persons can have the greatest impact on poverty. The programs will be funded within the state Allocation formula set forth in Section 203.

applications will be accepted only from the CAA; other local organizations can participate, however, as "delegate agencies" of the CAA. State Agencies can participate through the CAA's located in the area where the job exists, or through local CAA's throughout the State, referring applicants to the jobs.

2. Single Purpose Agencies (as defined in CAP Guide, Vol.1, Part B, Sec.7).

B. Other Funding Information

1. The program may provide the cost of training, additional supervision and salaries or stipends of participants. Local or State funds should be committed for the cost of salaries as rapidly as possible.
2. Federal funds should provide incentives to establish entry positions with a visible ladder of promotion, and salary increases.
3. Priority will be given to programs where the employing agency guarantees
  - (a) a job ladder
  - (b) an established system of wage raises
  - (c) increased contribution by the employing agencies of the salaries of the trainees.
4. At least ten percent of the cost of the program must be provided by local community (or other non-Federal funding source) up to July 1, 1967, thereafter 20% must be provided by the local community. (See Analyst Notebook #92.) All local share provisions applicable to CAP are equally applicable

to Sec. 205(e).

Priority will be given to programs where the employing agency (or other funding source) pays all or part of the trainee's salary during the first year's on-the-job training or employment. The employing agency (or other funding source) will be expected to pay at least 50 percent of the salary or training stipend during the second year. Only funds for continued training for upgrading will be available during the third year.

Trainees may receive Welfare payments plus excess payments while participants are in training, if their opportunity for increases and their compensation is comensurate with other trainees not on welfare. (See CAA Memo #47)

5. In order to assure impact, CEP programs will be funded at a minimum of \$500,000 except on experimental programs establishing new ways of providing service.
6. Employing agencies should utilize other funding sources (such as Medicare, ESEA, etc.) to provide the cost of salaries wherever feasible.
7. Federal funds to support salaries or stipends of any individual participant cannot be extended beyond two years.
8. Supervisory costs may be included as part or all of the local share. (The applicant can refer to the CAP Guide, Vol. II, Part 1, Section 4, for information pertaining to OEO policy on non-Federal share requirements.)
9. Materials and equipment will be contributed by the agency providing the work site, except in unusual circumstances, and can be charged to local contribution. A detailed justi-



fication will be required, if exception is requested.

10. Expenditures for fringe benefits afforded other employees and transportation cost where no public transportation is available may be included in project costs.
11. In training programs for subprofessionals to be employed in an ongoing in-school program, OEO will fund only the training and not the employment.
12. Funds to evaluate Community Employment Programs should be included as part of the budget.

13. No positions for subprofessionals already funded under Section 205 of the EOA would be eligible for funding under 205(e), and no reduction in the number of subprofessionals may occur, as a result of this new program.
14. No jobs should be developed that will not provide access to a job paying at least a minimum wage on completion of training. No program will be funded that pays less than the Federal minimum wage, during training or after. (It should be noted that the Federal minimum wage will be \$1.40 per hour after February 1, 1966, and \$1.60 after February 1, 1968.)
15. Opportunities for upgrading persons already employed by the employing agencies who are employed at a level beneath their capacity and at a level that maintains that an individual in poverty, may qualify for admission to a CEP program. If, through training, they will gain access to positions that will move them out of poverty, the cost of training, supervision, and the increase in wages will be covered by the program.

IX. HOW DOES ONE APPLY FOR A COMMUNITY EMPLOYMENT PROGRAM GRANT?

If the applicant is applying for OEO assistance for a Community Employment Program, the application should be made on regular CAP Forms described below: (Part F of the CAP Guide, Volume 1, contains general directions and information necessary to fill out CAP application forms).

The following forms are necessary for a formal application for a Community Employment Program.

CAP Form 1: Summary of Application. This is largely a self-explanatory form which provides key information. A principal use of this form is for the OEO Information System; please be sure that its figures are checked carefully against those in the body of the application.

CAP Form 2A: Non-Federal Share. This is a special form for use with Community Employment Program applications and is to be used to describe the different items that make up the non-Federal contribution, including any cash that is to be provided.

CAP Form 3L: Applicant Agency. Use this form to present information on the nature and composition of the applicant agency. Information on delegate agencies should be set forth as required on CAP Form 7B.

CAP Form 4: Eligibility of Applicant. It is advisable to have this form prepared by the legal counsel of the applicant agency. This form must, in any case, be executed by a lawyer.

CAP Form 5: Community Information. This form need not be resubmitted if it has already been filed with an earlier CAP Application. If the requested data is not available, the applicant may substitute other pertinent information on the characteristics of the community.

CAP Form 11: Civil Rights. This form must be signed by the applicant, as well as each Delegate Agency.

CAP Form 7B: Work Program. This is a special form, designed as a questionnaire to be filled in by the applicant. It is intended to stimulate thought and underline program alternatives and opportunities, as well as to give OEO reasonably complete information about the Community Employment Program. An applicant must supplement Form 7B with a concise description of the entire Community Employment Program.

Information that should be available in the narrative statement includes the following:

1. Employment potential, as demonstrated by letters of comment from the agency indicating that trainees will have access to permanent positions on existing staffs, at a wage at least equal to the Federal minimum wage.
2. Evidence of the support and involvement of professional groups in related fields.
3. Potential trainee population, their capabilities and aspirations.
4. Goals of the Project.

5. Recruitment and selection: Who will do what, where, and when: What selection standards will be used and why? Who will follow up on those not selected?

Training plan in detail, explaining, for each phase (pre-service, basic, institutional, on-the-job, supplemental) the training towards career advancement

1. duration
2. location of training
3. curriculum
4. method of presentation
5. faculty members to be used
6. method for assessing effectiveness of training as it proceeds and making any desirable adjustments
7. methods of assessing performance of trainees
8. criteria and techniques for determining successful completion of each phase of training
9. description of criteria for determining successful completion of training and readiness for employment
10. description of plans for providing compensatory education, health, and social service to trainees before, during, and after training
11. responsibility for counseling and referral of those who do not complete training at levels deemed satisfactory for employment.

Plans for Employment

The following information must be provided for each agency which plans to employ trainees.

1. name
2. type of agency (health department, home health agency, etc.)

3. address
4. geographical area served and characteristics of population served by agency to which personnel will be assigned
5. past experience and/or present capability to provide employment
6. number to be employed
7. conditions of employment, personnel policies and procedures relating to employment of trainees, including:
  - a. job description for trainee
  - b. assignment of trainees -- nature of assignment and how assignments will be made
  - c. supervision -- person(s) responsible
  - d. salary and benefit levels. (Salaries must not be lower than the Federal minimum. Indicate provisions for salary increments, if any.)
  - e. provision for career advancement
8. attach a letter from each agency stating the conditions for obtaining permanent employment
9. sources of funds to support continuous employment of trainees

#### Plans for Evaluation

Information regarding plans to evaluate the success of the project in achieving the goal for each section based on proposal submitted (recruitment, selection, training, employment).

#### X. HOW TRAINEE WILL BE HEARD

An advisory committee should be established to ensure adequate communication between program participants, CAA and employing agency personnel. The purpose will be to determine the adequacy of training and placement and

These programs will serve as models that will encourage other public and private agencies to establish similar programs. Civil Service Commissions, unions of Government workers, and professional societies will be involved both locally and nationally, in order to establish permanent positions, without Federal support, for persons trained under this program.

I. WHERE WILL COMMUNITY EMPLOYMENT PROGRAMS BE ESTABLISHED?

Community Employment Programs will be established in those communities where expectation is high that the local, State and Federal Civil Services and the private non-profit service agencies will create and maintain permanent positions after the removal of Federal support; where the programs can be expected to have a major impact; and where it can be demonstrated that poor people can be prepared for new types of permanent jobs that will provide expanded public services in areas of great public need. As in all community action programs, representatives of the group to be served should be involved, to the maximum extent feasible, in program planning.

II. WHY IS A COMMUNITY EMPLOYMENT PROGRAM NEEDED?

Many budgeted positions remain unfilled in public and private non-profit agencies offering social services to the poor, due to a lack of trained personnel. Filling these positions will not only provide jobs for the poor but will also improve services offered to the poor.

The impact of the critical shortage of workers and services in the areas of health, education, public welfare, and urban redevelopment is most severe on the poverty population. On the basis of evaluations of

subprofessionals employed in community action and other public and private service agencies, the subprofessional can undertake many of these jobs and can do them well and with personal satisfaction.

Improving the delivery of services to the poor by utilizing subprofessionals will be developed experimentally.

### III. COMMUNITY EMPLOYMENT OCCUPATIONS

Priority will be given to Community Employment Programs meeting one or more of the following requirements:

- A. Programs that offer access to unfilled positions through specialized training and the development of realistic Civil Service requirements. The selected must provide opportunity for upward mobility and wage increases with the acquisition of greater skill, experience, or reasonable academic qualifications (i.e. high school equivalency).
- B. New career opportunities which offer access to permanent job opportunities and upward mobility.
- C. Programs which develop occupations which provide improved direct service to the poor.
- D. Programs that will ease the professional shortages in the field of education, para-medical, etc.
- E. Programs that will provide a communication link between the professional and the poor.

Each application must include a description of what permanent employment opportunities will be available to the persons employed on the project after the expiration date of the grant. Statements from the local employing agencies, indicating their commitment to employ those



qualified for permanent positions, over and above present employment levels (exclusive of unfilled vacancies), should be included with the applications. The method of qualifying for these occupations (performance criteria, etc.) should also be included in the statement.

In no case will dead-end jobs offering no upward mobility, such as maids, janitors or waitress, be approved.

The support and assistance of local Civil Service agencies, professional groups, local government unions, and private non-profit agencies must be sought in the establishment of the new jobs.

In order to determine where meaningful new jobs may be created, the following questions should be asked:

- A. What activities now performed by professionals could be delegated to relatively uneducated and unskilled persons, if the latter were trained to perform these tasks?
- B. What points of contact between professionals and the poor can be facilitated by the presence of a subprofessional?
- C. What new and expanded services would improve an agency's operation, if people were trained to perform them?
- D. What meaningful tasks could low-income persons be employed to perform on a part-time basis, while being trained and educated to assume greater responsibility later on?

The emphasis of the program will be directed toward the creation of "New Career" jobs in established agencies in the public or private non-profit agencies offering a public service. Some job classifications will be those already established as subprofessional, utilized by CAA's (such as Neighborhood Workers, Health Aides or Casework Aides), but not as widely utilized by the more traditional institutions. Some occupations will be those established in Municipal, State and Federal Governments, that have not been available to the poor because of their

inability to pass written tests and their lack of academic qualifications or other unrealistic restrictive barriers. Under such circumstances, the CAA will be expected to work with the Civil Service personnel offices to permit performance criteria to be substituted for written tests and academic credentials, and the removal of other unrealistic prohibitions. The emphasis will be on the establishment of permanent and useful new jobs that have not previously been available to the disadvantaged and that provide opportunities for advancement through clearly established job promotions as the individual gains skill and experience.

New job classifications will have to be defined, and new job specifications and entry qualifications developed. The support and assistance of local government, unions, local Civil Service agencies and professional groups should be sought in defining these new classifications.

Each applicant should identify not less than three job titles with a plan for successive promotions for each of these positions.

Provision must be made for training including, if appropriate, the acquisition of academic qualifications to assist the capable individual to meet entrance requirements, pass Civil Service exams and qualify for promotion and advancement.

#### IV. WHO IS ELIGIBLE FOR TRAINING IN A COMMUNITY EMPLOYMENT PROGRAM?

Those persons selected to participate in the Community Employment Program must be 22 years of age and over, residents of target areas or rural areas with a high concentration of poverty who are unemployed or underemployed and are likely to remain in poverty.

#### V. PROGRAMMING A COMMUNITY EMPLOYMENT PROGRAM

The Community Employment Program should maintain the same qualitative standards in programming as any other Comprehensive Manpower

Program. (For program information, see Elements of a Comprehensive Manpower Program, pp. 7-14, in Community Action for Employment, an OEO publication.

All Community Employment Programs are required to include the following program elements:

A. Recruitment and Selection

The outreach and intake personnel of CAA Multi-Purpose Neighborhood Centers already funded by CAP should be utilized in the recruitment and selection of trainees for CEP to assure that the non-participants in other Manpower programs are, in fact, reached. Additional personnel can be added, however, if the workload of the unit, due to the new program, is likely to become excessive. The Employment Service, Welfare and other agencies in contact with individuals who can qualify for CEP, should be encouraged to refer applicants to the CAA intake center. Procedures must be developed for selecting individuals who can profit from training.

B. Enrollee Training

The Community Employment Program must provide a training program to equip the trainee with the skills necessary to perform the task and assist him to move from one job classification to another. Funds for continuing training can be made available even after the local agency assumes the total responsibility for the salary of the subprofessional.

Arrangements will be made for an agency considering a CEP program to consult with the CAP Training and Technical Assistance Office to utilize their training resources, and curriculum materials. Uniform training can thereby be established and resources shared, improving the level

of training and permitting a core curriculum to be developed as well as several areas of special training.

The on-the-job training responsibility will always be that of the agency providing the work site. Continuing basic education and continuing training will be the responsibility of the CEP grantee or its delegate agency.

After placement on the job, up to one-quarter of a trainee's time (based on a forty-hour week) can be spent in supplemental instruction and basic education. The length of time such training will be necessary and the number of hours will vary with the job classification and the qualifications of the trainees. Certain job classifications will require several months' training prior to full-time placement at a work site. Others will require a much shorter period. Wherever possible, the trainee should be assisted to qualify for a high school equivalency certificate, to assure opportunity for continued advancement. Groups planning to conduct training programs should work closely with potential employers and professional groups to assure that relevant training is provided to assure maximum employability. Where the trainee will be required to pass a Civil Service examination, that examination or a similar one should be developed and utilized as a guide in the training.

C. Training the Supervisor

No trainee should be placed in an agency under a supervisor who has not had prior experience in working with this type of applicant in a similar type of program, unless the supervisor be trained in the utilization of subprofessionals. Wherever feasible, the Supervisor and the trainee should be jointly trained for part of the time.

The training should include human relations, motivation and attitude problems related to the disadvantaged. The Supervisor should

understand the duties of the subprofessional, the expected time schedule when the trainee is likely to be able to assume new duties and when the trainee will qualify for an advancement. The professional and subprofessional roles should be carefully delineated in the Supervisor's training. The Administrative personnel should also be trained to understand the basic concepts of the utilization of the subprofessional.

D. Employment

The Applicant must plan the Community Employment Program with the goal of establishing the trainee in a permanent job as well as preparing him for advancement beyond the entry level of the subprofessional. Since the legislation states that Section 205(e) is to "provide maximum prospects for continued employment without Federal assistance", commitments must be obtained delineating the maximum duration of Federal work-training assistance both to the individual and to the agency.

The legislation further requires the program "to provide maximum prospects for promotion, advancement..." In no case will any program be approved for a period in excess of two years. However, in order to assure that all CEP trainees obtain either nonsubsidized permanent employment or are picked up in another program, follow-up services in excess of this period may be provided.

Any participant in a program funded under Sec. 205(e) who is unable to function successfully in the program through no fault of his own, must be offered the option of placement in a program funded under Sec. 205(d).

Reasonable standards of performance by trainees are to be established by the employer prior to the start of the program, and trainees will be required to meet them after an introductory period. Similar standards should be established to qualify for permanent employment and for advancement. Employers will be required to provide an opportunity for regular

advancement. Employers will be required to provide an opportunity for regular advancement within the agency in the same manner as non-trainee employees.

E. Counseling, Supportive Services, and Follow-up

1. The CAA or the delegate agency shall provide counseling, supportive services and follow-up services to all program participants for the duration of the program. If the CAA has already been funded for such services under a Manpower Program, new personnel can be added to existing units. Duplicate units will not be funded.

Continuing contact by the CAA with the local agencies providing the work site is of paramount importance. Follow-up services during the on-the-job training and after placement in the job are an essential part of such a program in order to determine whether the trainee is, in fact, being trained, is making a good adjustment to the job, and is being appropriately utilized.

2. Each application must also include plans for pre-employment health examinations, and medical treatment, where necessary, for all requiring treatment in order to be employed on the project.

Usually, this responsibility should be assumed by the local Public Health agency or in a comprehensive health center, but in situations where medical examinations and treatment are not available through established agencies, the cost of these services may be included in the Applicant's budget.

3. All individuals placed in permanent jobs should be evaluated one year after placement.

E. Reports

Applicants are required to prepare periodic program reports every four months as well as a summary and evaluation of the total operation of the

program at its conclusion. CAP monitoring of agencies where trainees are placed must assure high standards of training and employment.

Reports should be forwarded to the OEO Regional Office, the Office of Program Planning, and the Office of Training and Technical Assistance and must include information not previously reported:

1. Number of trainees referred to training,
2. Description of new job classifications and institutions in which training is occurring,
3. Numbers and kinds of permanent jobs obtained,
4. Evidence of upward mobility,
5. Numbers leaving the program and the reasons; and provisions made for individuals who drop out,
6. Information on training including faculty, facilities and curriculum,
7. Involvement of agencies, institutions and professional groups,
8. Techniques that have proven successful,
9. Unresolved problems.

#### VII. WORKING CONDITIONS

All grantees will be required to observe at least minimum fair labor practices in the operation and administration of approval projects, including the following:

- A. Projects must not displace regular workers.
- B. The Federal minimum wage for a full 40-hour week (except where placement or training is in part-time jobs), or the prevailing



local wage for comparable work, whichever is higher, must be paid. Time and a half will be paid for overtime. Where other workers receive bonuses for working evening and night shifts, trainees will receive a similar bonus.

Trainees will be paid for the time spent in supplemental or basic education as well as while on the job.

- C. Appropriate working hours and standards must be observed for the health and safety of the worker.
- D. Workmen's and unemployment compensation, must be provided to all trainees, fringe benefits provided other employees should be available to participants of the CEP.
- E. All workers employed under this Community Employment Program must be advised personally, before training, as to their rights and benefits in connection with such employment. Included in this must be information about the availability of frings benefits, unemployment insurance coverage, grievance procedures, union participation, prospects for employment beyond the grant period and opportunities for advancement.
- F. Opportunity must be provided for the trainees to become a member with full rights and privileges of any union holding or seeking a bargaining contract with the agency providing the work site.
- G. Vacation and holiday pay, consistent with local practices, is recommended.

#### VIII. INFORMATION ON FUNDING

##### A. Who May Apply

- 1. Federal assistance for a Community Employment Program will be available to community Action Agencies (CAA's) funded under Section 204 or 205 of EOA. In localities where a CAA exists,