

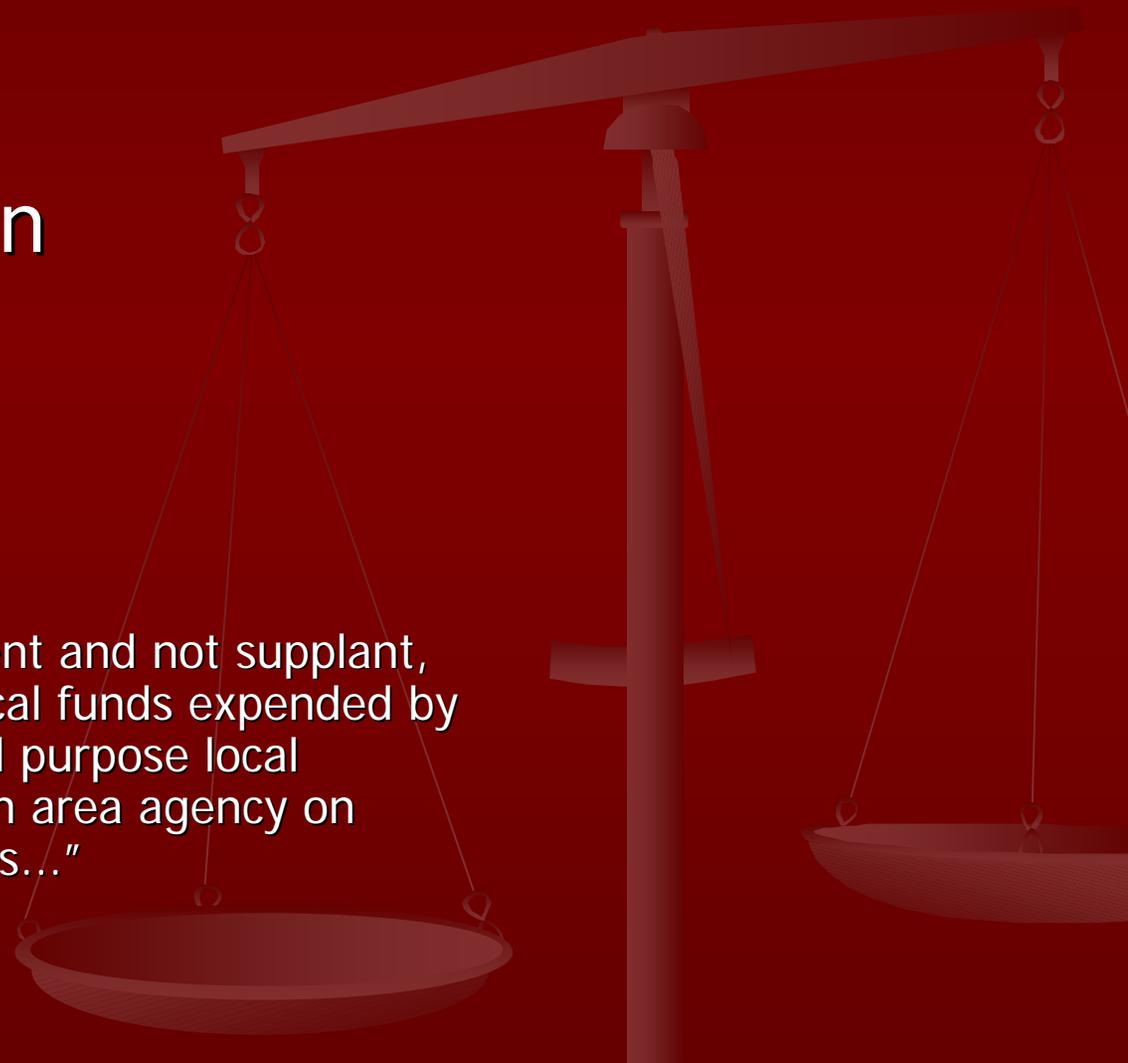
# “What’s ‘sup?’”

Supplementation

vs.

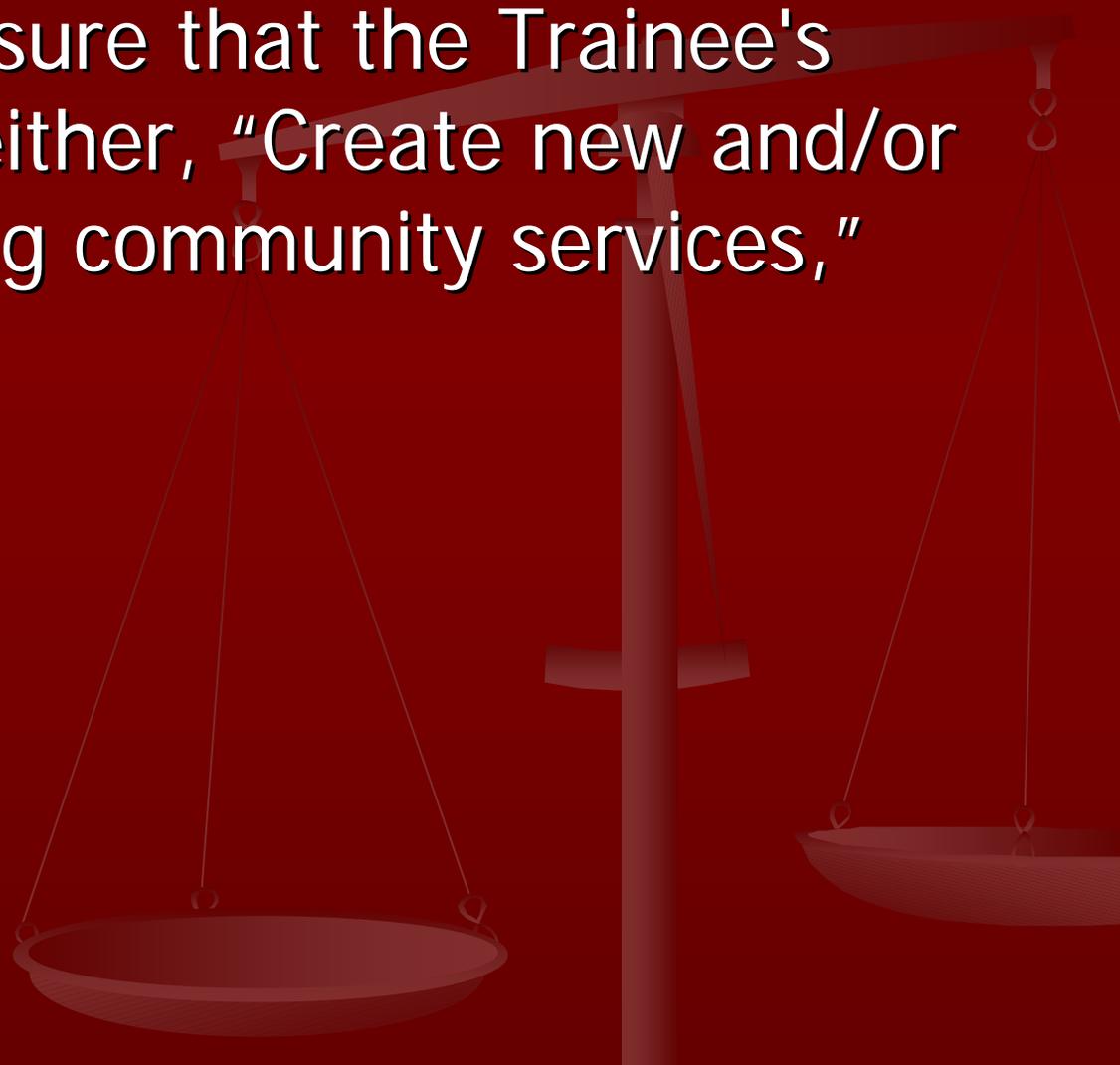
Supplantation!

“Funds ... shall supplement and not supplant, any Federal, State, or local funds expended by a State or unit of general purpose local government (including an area agency on aging) to provide services...”



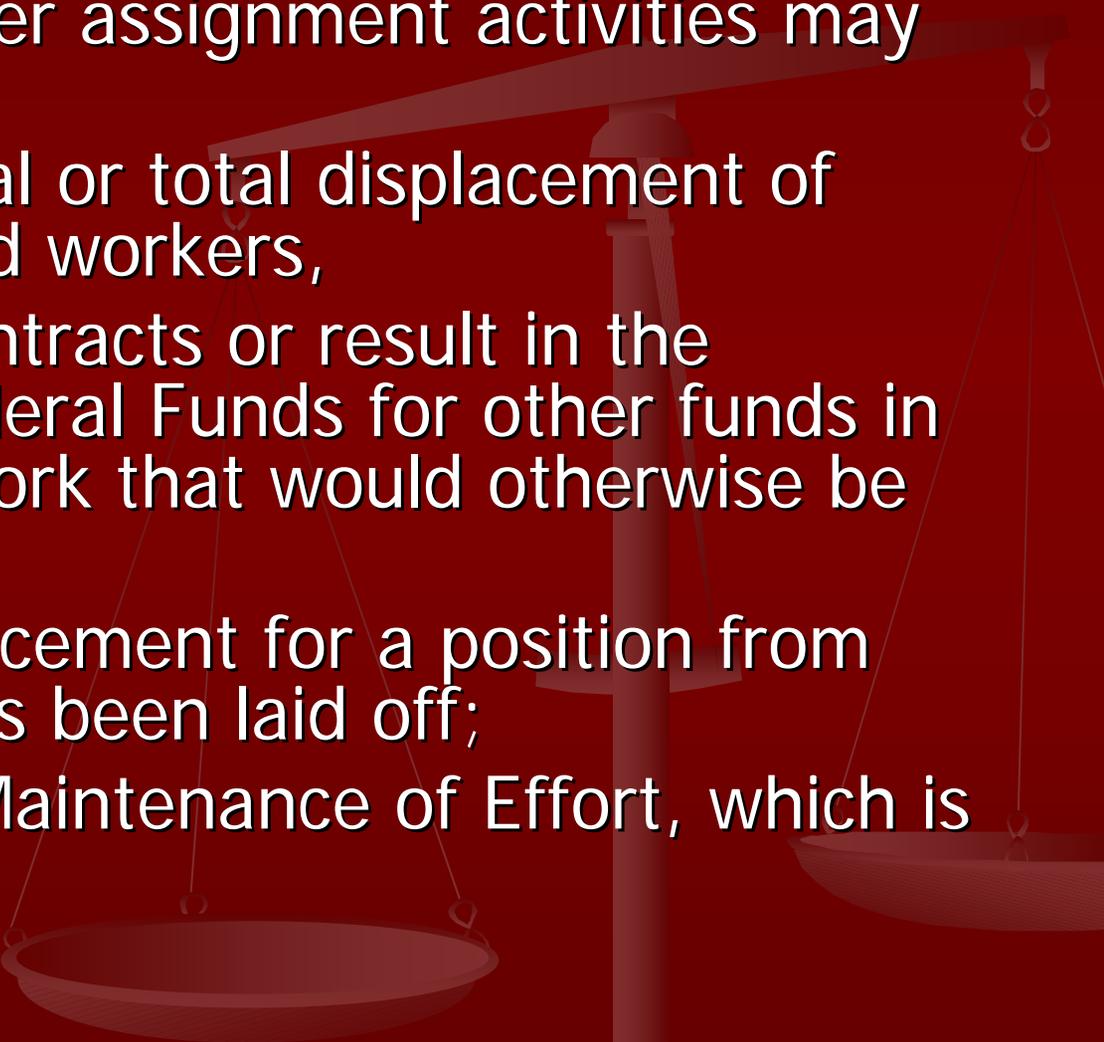
# Goal of the Program

Definition: To ensure that the Trainee's activities will either, "Create new and/or expand existing community services," only.



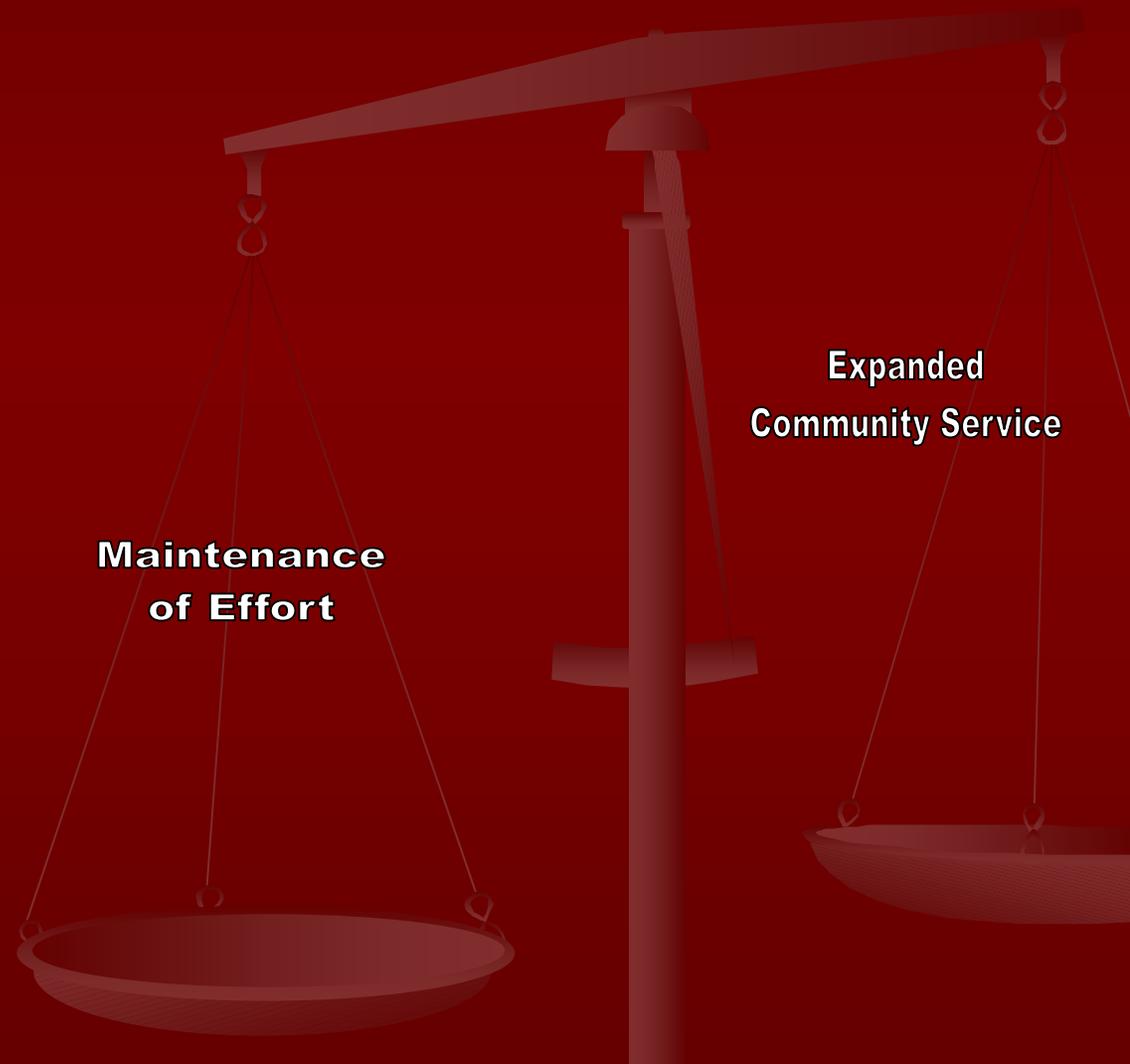
# Maintenance of Effort

The Trainee or his/her assignment activities may not:

- Result in the partial or total displacement of currently employed workers,
  - Impair existing contracts or result in the substitution of Federal Funds for other funds in connection with work that would otherwise be done,
  - Be used as a replacement for a position from which a person has been laid off;
  - These constitute Maintenance of Effort, which is illegal.
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# How does your program measure up?

- As a SCSEP provider?
- As a Host Agency Customer?
- How do you recognize when the scales are tipped the wrong way?
- What are the ramifications of a mismanaged program?



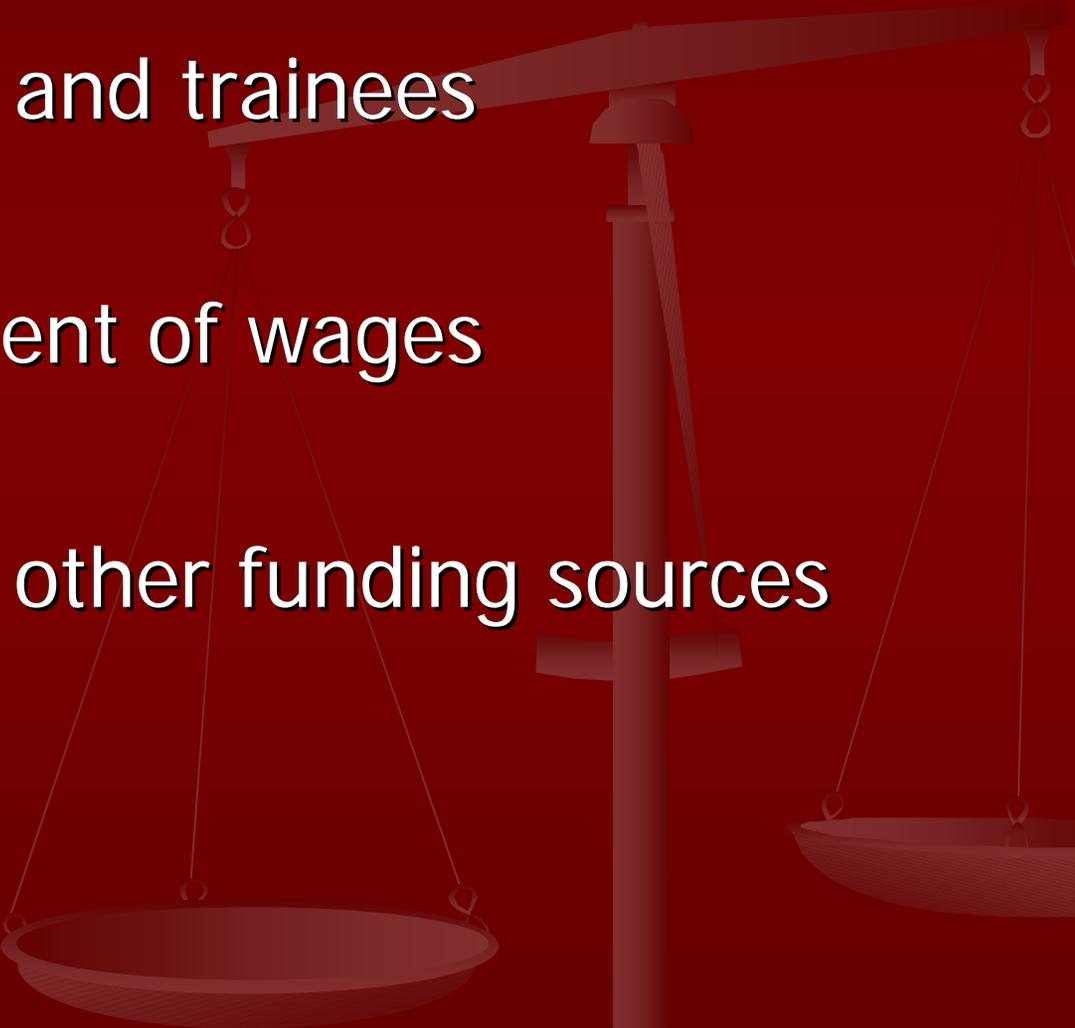
# Provider Concerns

## Serious consequences

- Compromise funding and future grants
- Repayment of wages
- Raises ethical issues



# Host Agencies Concerns

- Loss of contract and trainees
  - Possible repayment of wages
  - Potential loss of other funding sources
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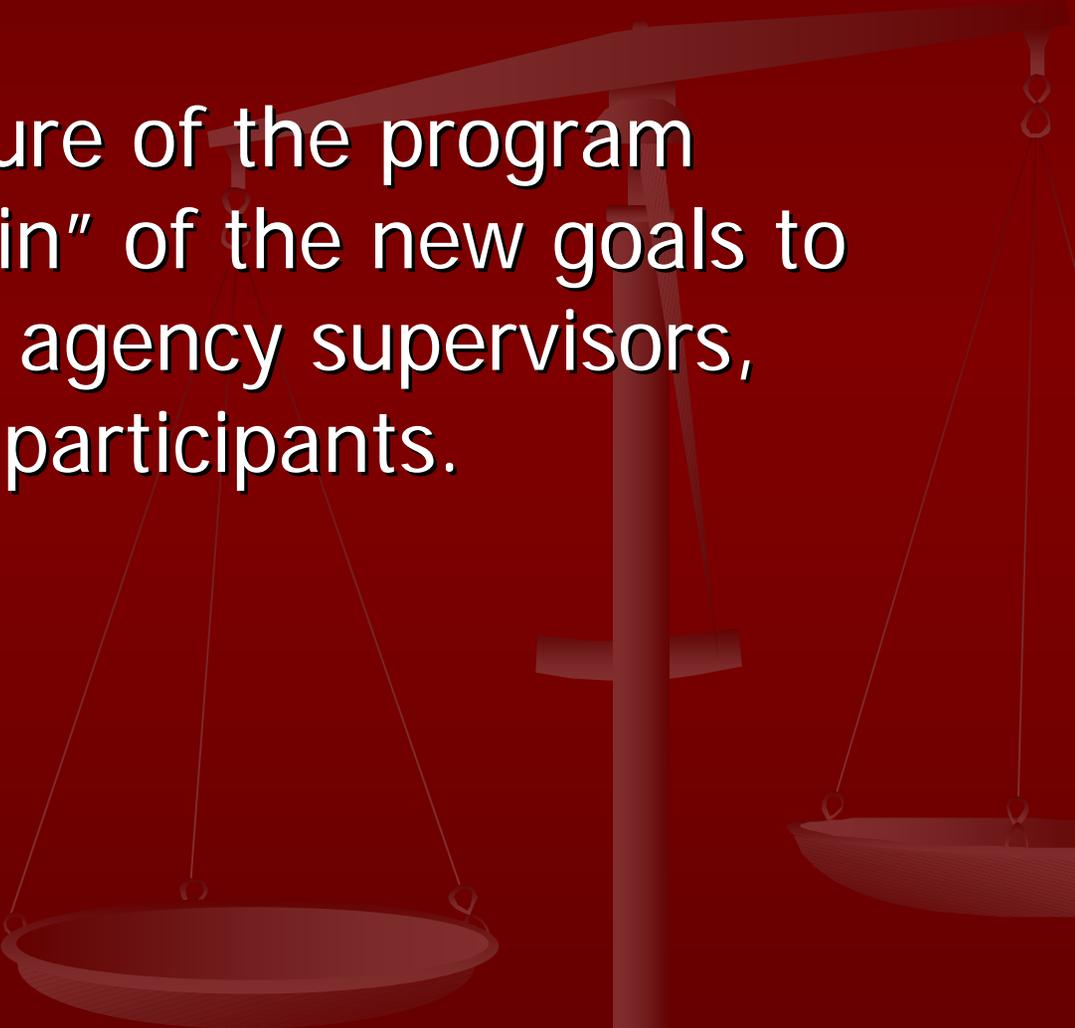
# Host Agency Tip Offs!

- Recent layoffs
- Unfilled advertised positions
- Permanent job assignment descriptions



# Are Your Host Agencies a Help or a Hindrance?

Changing the culture of the program requires a “buy-in” of the new goals to include the host agency supervisors, executives, and participants.



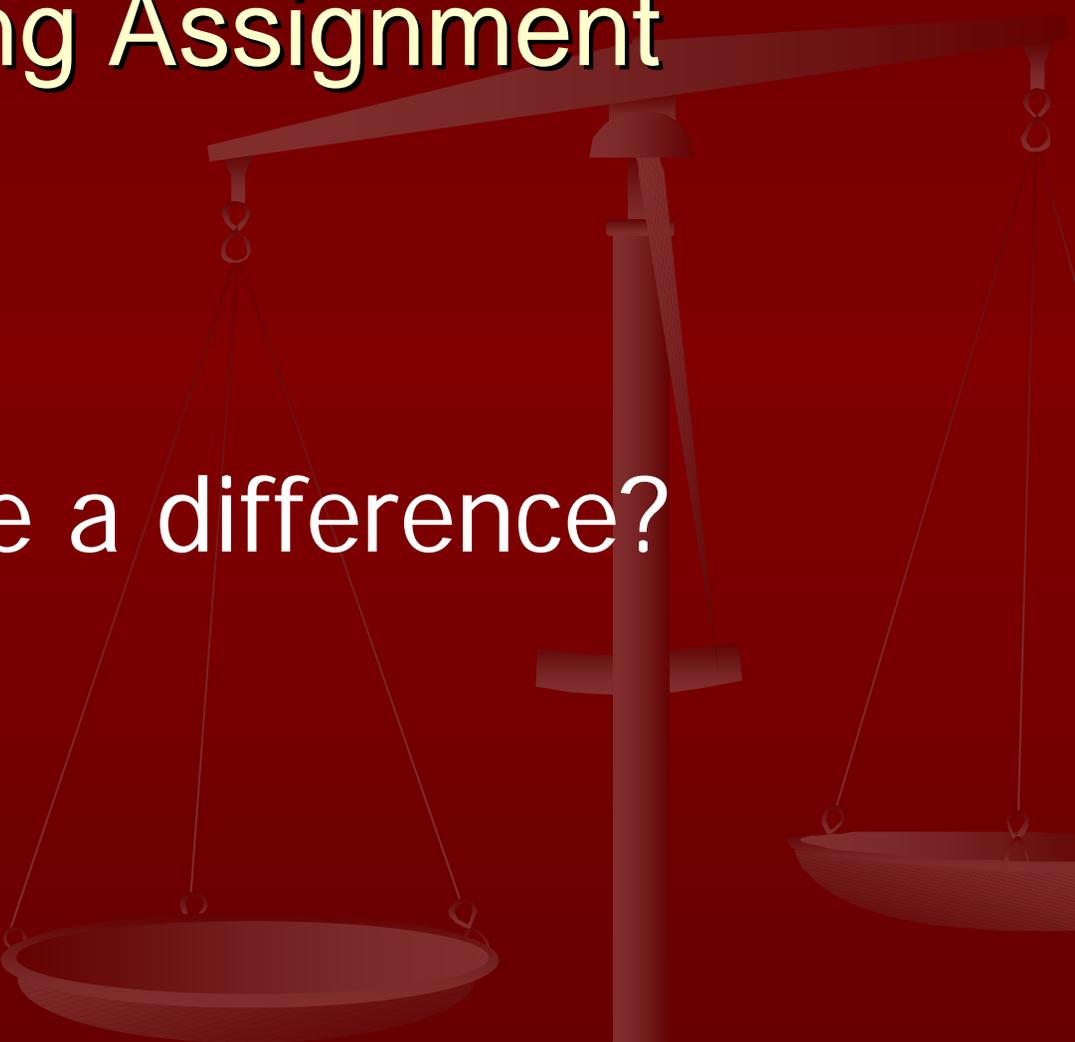


# Top Ten M.O.E. List

- "Can you enroll Bill in your program for 20 hours? Then I can have the other sponsor enroll him for 20 more hours a week."
- "We can take the clerical position out of the budget; we have a Title V worker instead, now."
- Too many hours reported on time sheet: "Oh, he put those hours on the wrong time sheet, those were his community service hours."
- "What do you mean we can't charge for the class that our trainee is teaching?"
- Double dipping: Having a Title V Worker doing a sheltered workshop job funded by another source.
- "You can't transfer my trainee, he's substituting for his supervisor while she is out on sick leave, and is actually doing a better job."
- Supervisor: "Please assign me a Title V worker who can substitute for me during my two-month vacation."
- "I'll have to close my doors if you transfer my trainee; no one else can do her job."
- Beware of assignment descriptions that are actual staff job descriptions: "Assistant Litter Collection Supervisor"
- "Before you transfer 'my person' can you get me a new person so he can train her before he leaves?"
- Trainee: " I make things to sell to keep the center open as part of my assignment."

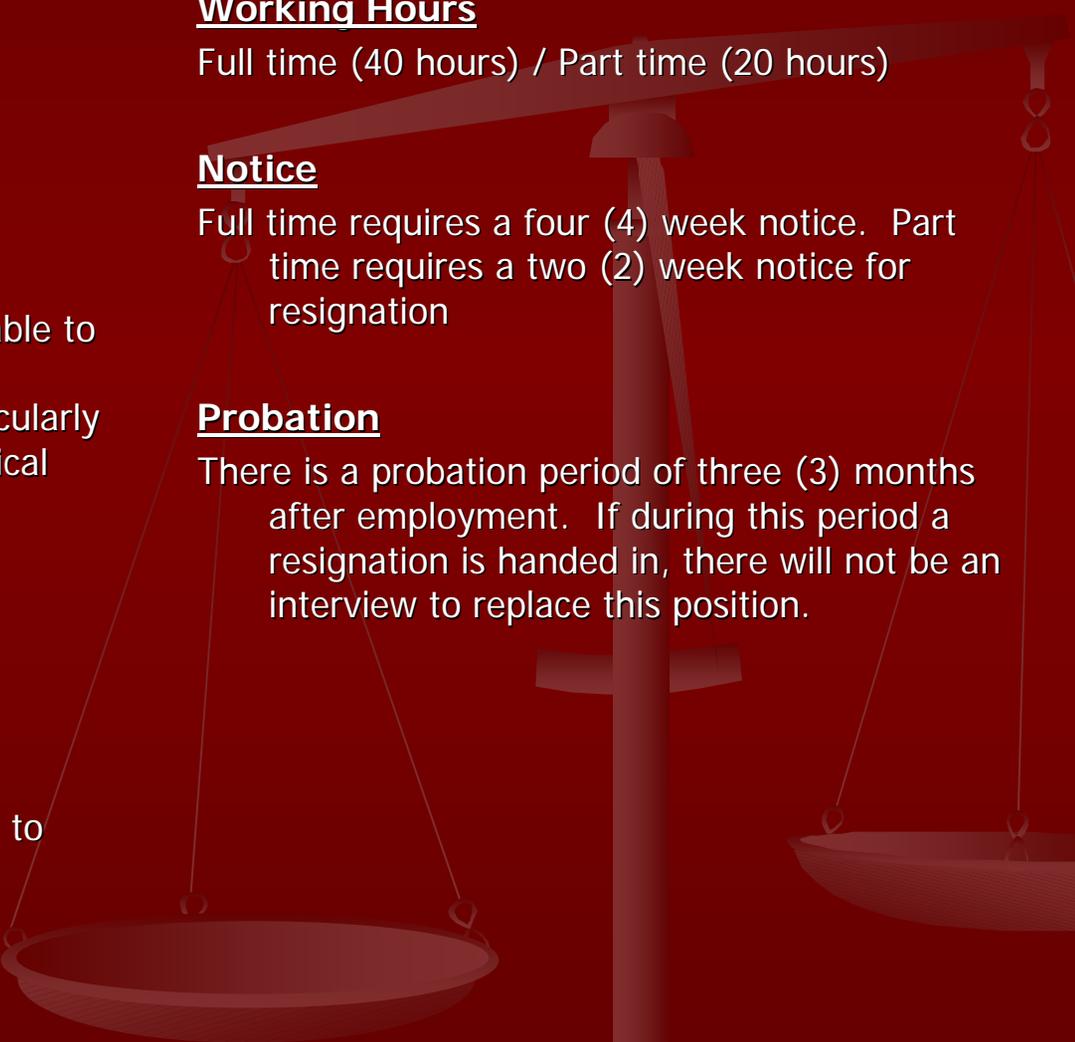
# Job Description vs. Training Assignment

Is there a difference?



# Tipping the Scale

## Examples



### Position Title

Assistant Collection Supervisor  
Site Manager  
Clerical I

### Qualifications

Willing to work outdoors or in an office, able to effectively communicate with others, willingness to supervise others (particularly youth), ability to complete light physical work, exhibit pleasant demeanor.

### Job Classification

Non-professional

### Salary

\$5.40 and hour. Salary increases subject to contract and funds

### Working Hours

Full time (40 hours) / Part time (20 hours)

### Notice

Full time requires a four (4) week notice. Part time requires a two (2) week notice for resignation

### Probation

There is a probation period of three (3) months after employment. If during this period a resignation is handed in, there will not be an interview to replace this position.

# Best Practices

- ☑ Good Trainee and Host Agency Orientation
- ☑ Good Training at Supervisor's meeting
- ☑ Regs refresher at quarterly meetings
- ☑ Participant tailored IEP with defined training timelines
- ☑ IEP driven training assignments
- ☑ Avoid receiving fees for services and revenue generating funds
- ☑ Host Agency "Buying into the IEP"
- ☑ Transferring to further trainee skill development
- ☑ Training activities outside the Host Agency
- ☑ Unannounced regular monitoring visits including IEP updates
- ☑ Watch for supervisors that don't buy into the program... be an advocate for trainees
- ☑ Watch for host agencies that arbitrarily expand assignment duties
- ☑ Scrutinize inconsistencies on time sheets

Follow your instincts!

# Maintenance of Effort Creed

*“Neither supervisors, nor homesteaders, nor supplanted training assignments, nor inconsistent time sheets shall deter us from complying with our appointed SCSEP goals.”*

