

## Senior Community Service Employment Program Equitable Distribution<sup>1</sup> Report Instructions Program Year 2020

### I. Overview

In 2012, the Department of Labor created an online Equitable Distribution (ED) tool to assist Senior Community Service Employment Program (SCSEP) grantees with ED reporting. The updated tool uses the latest Census data to display ED within all counties in each state and SPARQ data to reflect enrollments by quarter. Tables and maps showing Authorized and Modified Positions (AP and MP) and enrollments for each county, as well as summary information and variance (overenrolled or under-enrolled) calculations, are available at [SCSEPED.org](http://SCSEPED.org).

Grantees must use the information in SCSEPED.org as a basis for their annual ED report. The Q4 PY 2020 tables display Authorized Positions for all grantees and enrollments as of March 3, 2021. Grantees must attach the current quarter of the Modified Position tables, downloaded from [SCSEPED.org](http://SCSEPED.org) to their reports. The PY 2020 Grantee ED Reports submitted by the national grantees and the PY 2020 State ED Reports submitted by the state grantees on behalf of all grantees in their states must use Q4 PY 2020 SCSEPED.org data.

### II. Equitable Distribution Reports

**a. SCSEP Grantee ED Report ETA-8705B**

*(Attachment - ED Report Form ETA-8705B)*

All SCSEP grantees (national and state grantees) must submit the *Grantee ED Report ETA-8705B* on an annual basis. National grantees should use the Modified Positions by Grantee tables for this report, and state grantees should use the Modified Positions by State tables.

**b. SCSEP State Equitable Distribution Report ETA-8705A**

*(Attachment II: ED Report Form ETA-8705A)*

Each state grantee, in addition to the Grantee ED Report, must also submit the *State Equitable Distribution Report ETA-8705A*. The state grantee must coordinate with all SCSEP grantees operating within the state on an analysis of the statewide data from the Modified Positions by State table. This report must represent the aggregate variances, reasons for and significance of the variances, and the steps to correct/resolve significant variances for counties served by the grantees operating within the state.

### III. Instructions

Grantees must use the information in the SCSEPED tool as the basis for the report. Please ensure that the Equitable Distribution Report's data are consistent with the numbers and percentage of variance displayed in the tables downloaded from [SCSEPED.org](http://SCSEPED.org) for the current quarter. ***You may also use more recent QPR data or other data collected by the grantee in your analysis, but the starting point for the report is the snapshot in time provided by SCSEPED.org.***

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<sup>1</sup> *Equitable distribution report* means a report based on the latest available Census or other reliable data, which lists the optimum number of participant positions in each designated area in the State, and the number of authorized participant positions each grantee serves in that area, taking into account the needs of underserved counties and incorporated cities as necessary. This report provides a basis for improving the distribution of SCSEP positions. See, 20 CFR §641.140.

### *Section I – Summary of Variance*

The data for Section I come directly from the summary at the top of the relevant tables in SCSEPED.org.

### *Section II - Discussion: reason for and significance of the variance*

In this section, you should provide a detailed analysis of the significance of the variance for each county and explain the reasons for and challenges in addressing the variance. Remember, the data provided by SCSEPED.org are just a snapshot in time. If the degree of variance in some counties has been problematic over time, please explain why these ongoing problems have not been successfully addressed.

Grantees are required to analyze their ED performance over time, determine if any variance is significant, and if so, explain the reasons for the variance.<sup>2</sup> Here is a brief summary of considerations for your analysis.

- Counties with NO modified positions: If there are active participants enrolled, grantees must provide a detailed explanation and any strategies or action steps taken to address the enrollment.
- Variances in small counties, with 1-5 modified positions have to be examined with care. Remember, a change of enrollment of just one person can substantially change the degree of variation. It is critical to look at the trend for the county in these instances to determine whether the variance you see is real or just anomalous.
- Medium-sized counties, of 6-19 modified positions, can suffer from the same problem, but to a lesser degree. Again, looking at the trend for the county over time is critical.
- Larger counties, with 20 or more positions, are less likely to have the extreme “swings” in variance that smaller counties do. However, in a large county, a relatively small percentage variance may signal a problem. Again, look to the trend.
- You should be on the lookout for consistent over-enrollment in some counties with an associated under-enrollment in others.
- Trend analysis should tell you whether substantial variation you are seeing in a county is random noise or if it is something more systematic.
- If you find persistent, troubling variation, you should do a problem diagnosis: Why is this happening? Is the sub-grantee over-extended? Are the counties in question very rural? Is recruitment a problem? What are the barriers to recruitment? Only after the problem is diagnosed should you think about solutions, e.g., reconfiguring sub-grantee territories, swaps, or enhanced outreach efforts.

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See, 20 CFR §641.302, §641.360, and §641.365.

### *Section III – Plan to improve ED in your grant during the program year*

This section requires a detailed explanation of the action steps that will be taken to improve the ED variances in each affected county during the upcoming program year.

- Describe how you will work to address and resolve the variances in each relevant county within the state(s).
- The action steps you identify should be directly related to your analysis of the causes of the variances in Section II of the report.
- Provide concrete steps you are taking or will take to improve ED, particularly in difficult to serve areas, such as rural or remote counties, counties where there has been a significant historical inequity, and areas where there have been significant changes in the number of modified positions.
- For states submitting the *State Equitable Distribution Report ETA-8705A*
  - ✓ Ensure the report represents the collective contributions and commitment of all SCSEP grantees within the state.

Here are a few options to consider when evaluating your opportunities for improving equitable distribution in your service delivery areas:

- Some grantees have consolidated their positions into a relatively small number of counties while others seek to have a presence in many or all counties, even when another grantee is serving those counties. The Department of Labor (DOL) has encouraged grantees to engage in swaps that result in the consolidation of positions and the elimination of multiple grantees in the same county. Consolidation can help grantees provide services more efficiently.
- Grantees can administer their grants through sub-recipients; DOL does not determine how county ED requirements are translated into sub-recipient service areas. However, if there are a large number of sub-recipients in a small service area, it might be hard for a sub-recipient to meet ED in all counties. DOL has encouraged grantees to consolidate sub-recipients to achieve greater economies of scale and potentially improve ED
- DOL does not allow the transfer of grant funds from one grantee to another, nor will DOL allow transfers from one sub-grantee to another solely to address under- or over-enrollment that violates ED. Providing a larger service area to sub-grantees with a mix of large and small counties may facilitate the expenditure of grant funds; this approach may also minimize the reduction or increase of participant hours toward the end of the program year.

## **IV. Submission and Review of Reports**

### National Grantees

Must submit their Grantee ED Report ETA-8705B to [Grants.scsepdocs@dol.gov](mailto:Grants.scsepdocs@dol.gov), with a copy to the FPO, **no later than June 1, 2021**.

### State Grantees submitting Grantee Report

Must submit the State ED Report ETA-8705A to [Grants.scsepdocs@dol.gov](mailto:Grants.scsepdocs@dol.gov), with a copy to the FPO, **no later than June 15, 2021**.

The SCSEP program office will review all ED report submissions and notify grantees of its findings. Grantees must obtain full approval of their report for the program year. Additional action steps to meet the standard of approval will be sent to the grantee and FPO for those grantees that are only conditionally approved. The grantee will then be required to submit a provisional ED report to address any deficiencies to [Grants.scsepdocs@dol.gov](mailto:Grants.scsepdocs@dol.gov), with a copy to the FPO.

**If you have questions about the ED reports, please direct them to your FPO and National Office Liaison.**

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## V. ED Pilot Project Proposal

Grantees have long noted the difficulty of complying with ED in counties with a small number of positions, especially in rural areas. This problem has become more common as increasing minimum wages have reduced the number of modified positions in many counties. As part of the State ED Report, any or all of the grantees in a state may opt to implement a pilot project for tracking ED in a cluster of contiguous or near contiguous counties in which the grantee has 5 or fewer modified positions in each of the pilot counties. Participation in the pilot is optional for all grantees.

DOL will approve one pilot project ED proposal for PY 2021 from each state grantee and up to five pilot proposals from each national grantee (no more than one of which can be in any one state) that result from the discussions of the state and national grantees during preparation of the State Grantee ED Report. Each pilot cluster can contain no more than 20% of the eligible counties in the state. The proposals should be part of the improvement plan in section III of the State Grantee ED Report. The report must include how:

- The proposals resulted from discussions among the state and national grantees in the state;
- The grantees considered swaps that would consolidate positions in these counties and eliminate duplicate coverage;
- In defining clusters, the grantees considered existing local or regional service areas, such as regional economic planning agencies, health districts, and social services regions;
- Grantees determined the geographic proximity of the counties where the clusters are not contiguous, and the reason(s) why contiguity was not feasible. (Please attach maps showing any non-contiguous counties in a cluster); and cvv b2\*/3` ,, ds577
- The grantees will track ED in each county in the clusters and within each cluster as a whole. No changes to SCSEPED.org will be possible during PY 2021.

A spreadsheet showing the counties by grantee in each state with fewer than six modified positions in PY 2020 is attached to facilitate the grantee discussions and planning.