SIMPLIFYING EQUITABLE DISTRIBUTION (ED) FOR GRANTEES
OBJECTIVES

Equitable Distribution Overview

Navigating SCSEPED.ORG

Equitable Distribution Reporting
- Summary of Variance
- Reasons for and significance of variance
- Plan to improve Equitable Distribution
- Factors to consider when improving Equitable Distribution

Equitable Distribution Pilot Project
EQUITABLE DISTRIBUTION
OVERVIEW
**Question # 1**

The Equitable Distribution Report is based on which of the following?

A. The number of potential employers in a local area in accordance to 20 CFR § 641.110

B. The number of available Community Service Assignments in a local area

C. Latest available Census or other reliable data in accordance to 20 CFR § 641.140

D. Latest available voter registration records

**Question # 2**

Which of the following statements is TRUE about authorized positions?

A. Defined as the number of enrollment opportunities funded by DOL for 6 - month period

B. Adjusted each year based on the existing ED and the congressional appropriation

C. Authorized participant positions only apply to formerly incarcerated participants

D. Authorized participant positions only apply to disabled participants
WHAT IS EQUITABLE DISTRIBUTION?

Statute and annual funding appropriated by Congress determine how many authorized positions (AP) are available in each state.

Within each state, the distribution of AP to the counties is determined by each county’s percentage of the SCSEP-eligible population in the state as determined by the Census. ED is reset for each national grantee competition.

ED is the obligation to serve each county in accordance with its number of positions. It is part of your grant obligation.

ED fosters the movement of positions from over-served to underserved locations and the equitable serving of rural and urban areas.
GRANTEE OBLIGATIONS

• Grantees are not expected to serve every county at the precise ED level at all times
• Grantees are expected to monitor ED and to enroll or stop enrolling in counties as necessary to comply with ED to the greatest extent possible
  ✓ Grantees can never terminate participants because of ED
• ED, like the priorities of service, requires that grantees have a recruitment plan and enroll with intentionality
• You cannot satisfy either statutory responsibility if you just take anyone who walks through the door
• Consideration of ED is not something you think about only when you do your annual ED Plan; it should be part of normal daily operations
AUTHORIZED VS. MODIFIED POSITIONS

- Authorized Positions (AP) are defined by statute as the number of positions the Congressional appropriation is designed to support
  - Authorized positions are derived by dividing the total amount of funds appropriated for a program year by the national average unit cost per participant for that program year. The average unit cost is based on the federal minimum wage
  - Authorized positions are adjusted each year based on the existing ED and the Congressional appropriation

- Modified Positions (MP) were created by DOL to account for differences between local minimum wages and the federal minimum, since we are funded based on the federal minimum wage, but we are obligated to pay any higher local minimum wage. MP reflect the number of positions we can actually support
  - AP are reduced by the percentage that the federal wage is lower than the local wage to produce MP
  - ED uses MP because they reflect the level of enrollment you are funded for
WHAT IS THE STANDARD FOR ED COMPLIANCE

• There is no simple standard
• The size of the county, its density, the degree of under- or over-service, the trend over time, and external factors all come into play
• ED is updated in SCSEPED.org quarterly with the posting of the current enrollment data. The AP remains the same throughout the program year unless there is an approved swap of positions
• This snapshot in time by itself can only suggest how you are doing at that moment; it is never a definitive answer—examining the trends over time is essential
  ✓ At any given moment, grantees can be over- or under-enrolled for good reasons
  ✓ Performance changes constantly so seemingly good or bad ED performance can evaporate in a minute
SCSEPED.ORG OVERVIEW
Question # 1

Having a “negative variance” number means that the grantee __________:

A. Has not formed meaningful relationships with participants
B. Is under-enrolled
C. Is under-enrolled because Community Service Assignments are not aligned with participant IEPs
D. Is under-enrolled because participant IEPs are incomplete

Question # 2

Having a “Positive Variance” means that the grantee is __________:

A. Over-enrolled due to positive satisfaction survey result
B. Over-enrolled in a county compared to latest national employment rate
C. Over-enrolled in a county that exceeds the assigned modified position
D. Under-enrolled due to COVID-19
• Provides SCSEP grantees and sub-recipients access to information about the number of SCSEP authorized and modified positions, the number of current enrollments at the beginning of the quarter, and the difference between the two (variance) in each county in the country

• It provides details at the county level and summaries at the grantee and state levels
SCSEPED.org Home Page (snapshot provided to your right) provides updates, overview of SCSEPED.org and access to multiple Tabs.

The two main tabs utilized for ED reporting is:

- **“Modified Position by State tab,”** provides the viewer, the state grantee ED data as well as national grantee(s) (there are states with more than one national grantee) ED data serving within the state.

- **“Modified Position by Grantee (national) tab,”** provides ED data on national grantee by state, and county by quarters.
KEY FUNCTIONS WHEN NAVIGATING MP BY GRANTEE PAGE

1. **Drop down menu**, you can select Year, Quarter and Grantee

2. You can utilize these tabs to export a table & two summaries

3. **Summary Table by state** includes MP, Enrollment & Variance

4. **Summary Table of county by quarter which includes the variance**
# Key Functions When Navigating MP by State Page

## Modified Positions by State

<table>
<thead>
<tr>
<th>State</th>
<th>FY Year</th>
<th>Quarter</th>
<th>Statewide Summary</th>
<th>MP</th>
<th>E</th>
<th>V</th>
<th># Counties</th>
<th>% Under</th>
<th>% Over</th>
<th>% Under</th>
<th>% Over</th>
<th>% Under</th>
<th>% Over</th>
<th>Total V/FYP</th>
<th>Viz</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>State Grantee</td>
<td>55</td>
<td>58</td>
<td>3</td>
<td>1</td>
<td>100%</td>
<td>0%</td>
<td>0%</td>
<td>55</td>
<td>58</td>
<td>3</td>
<td>1</td>
<td>55</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>National Grantee</td>
<td>213</td>
<td>214</td>
<td>24</td>
<td>16</td>
<td>66.7%</td>
<td>33.3%</td>
<td>100%</td>
<td>55</td>
<td>58</td>
<td>3</td>
<td>1</td>
<td>55</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total ED Grantees</td>
<td>268</td>
<td>269</td>
<td>24</td>
<td>16</td>
<td>66.7%</td>
<td>33.3%</td>
<td>100%</td>
<td>55</td>
<td>58</td>
<td>3</td>
<td>1</td>
<td>55</td>
</tr>
</tbody>
</table>

## Spark Line Legend

1. Click on CSV TAB to Export State Table

2. National Grantee serving in the state
EQUITABLE DISTRIBUTION REPORTING
**EQUITABLE DISTRIBUTION REPORTING REVIEW QUESTIONS**

**QUESTION #1:**
Which of the following factors should be considered when evaluating ED performance?
A. Whether the variances are substantial and meaningful  
B. The cause(s) of any variance  
C. Both A and B  
D. How many years a grantee has had a SCSEP Grant

**QUESTION #2:**
Which of the following is an appropriate potential action to improve Equitable Distribution?
A. Consolidation of positions, including swaps with national grantees  
B. Having fewer sub-recipients  
C. Providing a larger geographic service area to sub-grantees  
D. All the above

**QUESTION #3:**
If a grant recipient wants to change/swap positions in one geographic area to another, the grant recipient must __________:
A. Coordinate any proposed changes with the local AJC  
B. Coordinate any proposed changes in position distribution with the other grant recipients in the State  
C. Contact their FPO or NOL for an approval letter  
D. All the above

**QUESTION #4:**
National grant recipients are required to submit an individual report describing __________?
A. The demographic characteristics of their participants over age 65  
B. Equitable distribution variances only for the state where their headquarters is located  
C. Reflect any approved swap in their state plan  
D. Equitable distribution variances for each state they operate in
SUMMARY OF VARIANCE

Copy data from the latest summary tables in SCSEPED into Part I

The last cell in the table should contain the total absolute variance divided by the modified positions. See “Definitions” in SCSEPED.org

Be sure to identify time period used for Part I

- You may need to include additional data from other time periods examined; e.g., all quarters in the current program year, the same quarter as the current quarter or the final quarter from one of more prior program years
ANALYZING ED PERFORMANCE

• Factors to consider in evaluating performance:
  ✓ Any counties in which the variance is substantial and meaningful
    ▪ Explain how you reached that determination
    ▪ Explain the causes of the variance
  ✓ Any counties in which the variance is substantial but not meaningful
    ▪ Explain how you reached that determination
    ▪ Explain the causes of the variance
BASIC ANALYSIS APPROACH

List of All Grantee Counties with Enrollment and Variance by Quarter.

<table>
<thead>
<tr>
<th></th>
<th>1st</th>
<th>2nd</th>
<th>3rd</th>
<th>4th</th>
<th>V</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MP</td>
<td>E</td>
<td>V</td>
<td>% V</td>
<td>MP</td>
</tr>
<tr>
<td>GEORGIA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13259</td>
<td>0</td>
<td>2</td>
<td>2</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>13187</td>
<td>5</td>
<td>2</td>
<td>-3</td>
<td>-60%</td>
<td>5</td>
</tr>
<tr>
<td>KENTUCKY</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21117</td>
<td>18</td>
<td>49</td>
<td>31</td>
<td>172.2%</td>
<td>18</td>
</tr>
<tr>
<td>PENNSYLVANIA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>42017</td>
<td>50</td>
<td>20</td>
<td>-30</td>
<td>-60%</td>
<td>50</td>
</tr>
</tbody>
</table>

- Counties with NO modified positions (*i.e.*, Georgia's, Stewart County) — if there are active participants enrolled, grantees must provide a detail explanation and any strategies or action steps taken to address the enrollment.
- Variances in small counties, with 1-5 modified positions (*i.e.*, Georgia's, Lumpkin County), have to be examined with care. Remember, a change of enrollment of just 1 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 (*i.e.*, Kentucky's, Kenton County), can suffer from the same problem, to lesser degree. Again, looking at the trend for the county over time is critical.
- Larger counties, with 20 or more positions (*i.e.*, Pennsylvania's, Bucks County) 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 still signal a problem. Again, look to the trend.
CONSIDERATIONS

✓ You should be on the lookout for consistent over-enrollment in some counties with an associated under-enrollment in others. If your ability to financially over-serve in some counties comes from targeted or deliberate under-service in others, that is problematic.

✓ There is a certain amount of “process noise” that can be expected from quarter to quarter. A trend analysis should tell you whether substantial variation you are seeing in a county is random noise or something more systematic.

✓ If you find persistent, troubling variation, you should be doing 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.
POSSIBLE SCENARIOS

**SCENARIO A:** In this scenario, it is easy to see that changes of 1 or 2 enrollments radically changes the variance.

<table>
<thead>
<tr>
<th>Scenario A</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Quarter 4</strong></td>
<td><strong>Modified Slots</strong></td>
<td><strong>Enrollments</strong></td>
<td><strong>Variance</strong></td>
<td><strong>Percent Variance</strong></td>
</tr>
<tr>
<td>County X</td>
<td>5</td>
<td>3</td>
<td>2</td>
<td>40.0%</td>
</tr>
<tr>
<td>Change of 1 enrollment</td>
<td>5</td>
<td>4</td>
<td>1</td>
<td>20.0%</td>
</tr>
<tr>
<td>Trend</td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
</tr>
<tr>
<td>Enrollment</td>
<td>5</td>
<td>4</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>Percent Variance</td>
<td>0.0%</td>
<td>-20.0%</td>
<td>0.0%</td>
<td>-40.0%</td>
</tr>
</tbody>
</table>

**SCENARIO B:** In this scenario, you can see that similar small changes in enrollment levels doesn’t have quite the same effect as the first scenario.

<table>
<thead>
<tr>
<th>Scenario B</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Quarter 4</strong></td>
<td><strong>Modified Slots</strong></td>
<td><strong>Enrollments</strong></td>
<td><strong>Variance</strong></td>
<td><strong>Percent Variance</strong></td>
</tr>
<tr>
<td>County X</td>
<td>30</td>
<td>25</td>
<td>5</td>
<td>-16.7%</td>
</tr>
<tr>
<td>Change of 1 enrollment</td>
<td>30</td>
<td>26</td>
<td>4</td>
<td>-13.3%</td>
</tr>
<tr>
<td>Trend</td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
</tr>
<tr>
<td>Enrollment</td>
<td>20</td>
<td>22</td>
<td>19</td>
<td>25</td>
</tr>
<tr>
<td>Percent Variance</td>
<td>-33.3%</td>
<td>-76.7%</td>
<td>-96.7%</td>
<td>-16.7%</td>
</tr>
</tbody>
</table>

**SCENARIO C:** In this scenario, there is a relationship between over-service in County Y and under-service in County X.

<table>
<thead>
<tr>
<th>Scenario C</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Quarter 4</strong></td>
<td><strong>Modified Slots</strong></td>
<td><strong>Enrollments</strong></td>
<td><strong>Variance</strong></td>
<td><strong>Percent Variance</strong></td>
</tr>
<tr>
<td>County X</td>
<td>15</td>
<td>10</td>
<td>5</td>
<td>-33.3%</td>
</tr>
<tr>
<td>County Y</td>
<td>30</td>
<td>35</td>
<td>5</td>
<td>16.7%</td>
</tr>
<tr>
<td>Trend</td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
</tr>
<tr>
<td>County X Enrollment</td>
<td>10</td>
<td>12</td>
<td>8</td>
<td>10</td>
</tr>
<tr>
<td>County Y Percent Variance</td>
<td>-33.3%</td>
<td>-20.0%</td>
<td>-50.0%</td>
<td>-33.3%</td>
</tr>
<tr>
<td>County Y Enrollment</td>
<td>35</td>
<td>33</td>
<td>34</td>
<td>35</td>
</tr>
<tr>
<td>County Y Percent Variance</td>
<td>16.7%</td>
<td>10.0%</td>
<td>13.3%</td>
<td>16.7%</td>
</tr>
</tbody>
</table>
• For each substantial and meaningful variance you identified in Part II, describe in detail what actions you will take to address the problem:
  ✓ Discuss any improvement actions you have previously taken and why they were not successful
  ✓ Your proposed new improvement actions must directly respond to the causes of the variances in Part II; otherwise, your actions are just random good ideas
  ✓ In designing your new improvement actions, be sure to consider the suggestions contained in the latest ED Report instructions
  ✓ Describe any training or technical assistance you will provide to your sub-grantees regarding their ED obligations under their sub-grant agreement with you
  ✓ List the steps you will take to monitor the implementation of the improvement actions and the frequency with which you will provide feedback to your sub-grantees
  ✓ Explain what additional steps you will take if the improvement actions do not have the expected results
FACTORS TO CONSIDER WHEN IMPROVING YOUR ED

• Potential Actions to Improve Equitable Distribution
  ✓ Consolidation of positions, including swaps with national grantees
  ✓ Multiple sub-recipients vs. consolidating sub-recipients
  ✓ 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

• Cautions
  ✓ DOL does not allow the transfer of grant funds from one grantee to another in order to make up for violating ED
  ✓ DOL will strictly scrutinize transfers from one sub-grantee to another that are intended to address under- or over-enrollment that violates ED
EQUITABLE DISTRIBUTION PILOT PROJECT
PILOT PROJECT FOR COUNTIES WITH FEW POSITIONS

• ED in counties with very few positions are often difficult to serve, especially in rural areas. As the minimum wage increases, the number of Modified Positions (MP) are reduced.

• As part of the State ED Report, grantees in a state may elect to track ED in a cluster of counties that each have 5 or fewer MP.

• Counties should be contiguous or near contiguous (counting counties within the cluster with 6 or more MP as contiguous).

• DOL will approve a cluster proposal from the state grantee. For each national grantee, DOL will approve no more than five cluster proposals in total with no more than one any in one state—if the proposals are included in the State ED Report.

• A spreadsheet showing the counties by grantee in each state with fewer than six modified positions in PY 2020 has been provided to all grantees to facilitate the grantee discussions and planning.
• The State ED Report should explain:
  ✓ How the grantees determined the clusters and why swaps that would consolidate positions in these counties and eliminate duplicate coverage are not applicable or feasible
  ✓ The extent to which, in defining clusters, the grantees considered existing local or regional service areas, such as regional economic planning agencies, health districts, and social services regions
  ✓ Why contiguity is not feasible if all the counties in a cluster are not contiguous
  ✓ Grantees must 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
For additional technical assistance contact: FPO, NOL or SCSEPTEchnicalAssistance@dol.gov

To access your ED data, please go to SCSEPED.ORG