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

EQUITABLE DISTRIBUTION OVERVIEW QUESTIONS

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

SCSEP ED TA REVIEW

NAVIGATING SCSEPED.ORG REVIEW QUESTIONS

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

SCSEPED.ORG PURPOSE

- 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

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.

Equitable Distribution/Authorized Positions

HOME | MODIFIED POSITIONS BY STATE | MODIFIED POSITIONS BY GRANTEE | DOWNLOAD MODIFIED POSITIONS | AUTHORIZED POSITIONS BY STATE | AUTHORIZED POSITIONS BY GRANTEE | DOWNLOAD AUTHORIZED POSITIONS | DEFINITIONS | CONTACT US

Welcome to SCSEPED.org

What's New: 4/28/2021: The modified positions for Q4PY2021 are incorrect and should not be used. The correct version will be posted in the next few days.

4/14/2021: PY 2020 authorized positions and modified positions, along with enrollments as of 4/1/2021, have been posted for Q4PY20.

1/20/2021: PY 2020 authorized positions and modified positions, along with enrollments as of 1/1/2021, have been posted for Q3PY20.
NOTE: Five national grantees -- ES, GII, IPDC, NICOA [G], and NOWCC -- received awards in new states effective Q3PY20. In order to display the authorized and modified positions in Q3, it was necessary to also display in the new states for these five grantees "-1" in the columns for AP and MP in Q1PY2020.

11/30/2020: Due to the end of life of Adobe Flash Player, "Maps" is no longer available on SCSEPED.org. Users can access the 2010 Census Geographic Areas Reference Maps for each state at https://www.census.gov/geographies/reference-maps/2010/geo/2010-geograph....

10/4/2020: Authorized and modified positions, along with enrollments as of 10/1/2020, have been posted for Q2PY20.

9/1/2020: PY 2020 modified positions and enrollments as of 8/5/2020 have been posted for Q1PY20.

8/17/2020: PY 2020 authorized positions and enrollments as of 8/5/2020 have been posted for Q1PY20.

Overview. SCSEPED.org provides all Senior Community Service Employment Program (SCSEP) grantees and sub-recipients access to information about the number of SCSEP authorized and modified positions, the number of current enrollments as of the end of the quarter, and the difference between the two (variance) in each county in the country. For state grantees and national grantees, the authorized positions displayed are those defined by Equitable Distribution (ED) for each program year. For set-aside grantees, the authorized positions are those listed in the grant award; these set-aside positions are separate from and in addition to any positions authorized by ED. The modified positions are calculated based on the minimum wage in each county. (Note: Due to rounding, the sum of the modified positions by county for a grantee or sub-grantee will not always equal the official modified positions displayed in the QPR for that grantee or sub-grantee.) The enrollment data are updated each quarter and reflect the number of enrollments active in SPARQ on the first day of the current quarter. At the end of the fourth quarter, the enrollments for that quarter are updated to reflect the enrollments on the last day of that quarter, which is also the last day of the program year.

Three functions are available to users:
1. Tables by State (both MP and AP in separate tabs).
2. Tables by Grantee (both MP and AP in separate tabs).
3. Download All States Data (both MP and AP in separate tabs).

1. Tables by state. There are separate tables for each state, the District of Columbia, and Puerto Rico. These tables are accessed by clicking on Tables by State in the menu bar at the top of the page. There are separate menu items for MP and AP. Dropdown menus at the top left corner of the screen allow the user to select the state, the program year, and the quarter to display. Only the selected quarter is displayed on this page. The tables list each county in the state, along with its FIPS code (the Census Bureau's identifier for the county), followed by three columns of data for each grantee that operates in the state: the number of modified or authorized positions assigned to the grantee in each county, the number of current enrollments in each county, and the variance in each county between the number of modified or authorized positions and the number of enrollments. A positive variance number means that the grantee is over-enrolled in that county compared to ED, and a negative variance number means that the grantee is under-enrolled.

The first set of columns lists the state grantee; subsequent columns list the national grantees that operate in the state. Set-aside grantees that operate in that state are listed in the columns farthest to the right.

A box at the top right corner of the page summarizes at the state level the modified or authorized positions, enrollments, and variance for the state grantee, all national grantees, the state grantee and the national grantees combined (for the total state ED), and all set-aside grantees. Additional columns list:

KEY FUNCTIONS WHEN NAVIGATING MP BY GRANTEE PAGE

SCSEP ED TA REVIEW

KEY FUNCTIONS WHEN NAVIGATING MP BY STATE PAGE

Equitable Distribution/Authorized Positions

HOME MODIFIED POSITIONS BY STATE MODIFIED POSITIONS BY GRANTEE DOWNLOAD MODIFIED POSITIONS AUTHORIZED POSITIONS BY STATE AUTHORIZED POSITIONS BY GRANTEE DOWNLOAD AUTHORIZED POSITIONS
DEFINITIONS CONTACT US

Modified Positions by State

1

State
Utah

PY Year
2018

Quarter
4th

CSV

Spark Line Legend

1: Click on CSV TAB to Export State Table

Statewide Summary	MP	E	V	# Counties	# Under	% Under	Avrg.% Und. E	# Over	% Over	Avrg.% Over E	#Over Under	% Over Under	Total V/MP	Viz
State Grantee	55	58	3	1		%	%	1	100%	5.5%	1	100%	5.5%	
National Grantees	213	211	-2	24	16	66.7%	45.1%	7	29.2%	53.4%	23	95.8%	37.6%	
Total ED Grantees	268	269	1	24	16	66.7%	26%	7	29.2%	53.4%	23	95.8%	28.7%	
Set-aside Grantees [S]						%	%		%	%		%	%	

2

FIPS	County	SG MP	SG E	SG V	ES MP	ES E	ES V
49001	Beaver						
49003	Box Elder				5	0	-5
49005	Cache				7	7	0
49007	Carbon				4	7	3
49009	Daggett				0	1	1
49011	Davis				20	20	0
49013	Duchesne				3	2	-1
49015	Emery				0	2	2
49017	Garfield						
49019	Grand				3	1	-2
49021	Iron				6	7	1
49023	Juab						
49025	Kane				1	0	-1
49027	Millard				2	0	-2
49029	Morgan				1	0	-1
49031	Piute				2	0	-2
49033	Rich				1	0	-1
49035	Salt Lake	55	58	3	49	38	-11
49037	San Juan				5	8	3
49039	Sanpete				3	2	-1
49041	Sevier				5	1	-4
49043	Summit				3	0	-3
49045	Tooele				5	3	-2
49047	Uintah				4	3	-1
49049	Utah				31	37	6
49051	Wasatch				2	0	-2
49053	Washington				22	22	0
49055	Wayne				2	0	-2
49057	Weber				27	50	23
		55	58	3	213	211	-2

2: National Grantee serving in the state

SCSEP ED TA REVIEW

EQUITABLE DISTRIBUTION REPORTING

SCSEP ED TA REVIEW

EQUITABE 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.

Quarters		1st				2nd				3rd				4th			V
		MP	E	V	% V	MP	E	V	% V	MP	E	V	% V	MP	E	V	% V
GEORGIA	County	MP	E	V	% V	MP	E	V	% V	MP	E	V	% V	MP	E	V	% V
13259	Stewart	0	2	2	0%	0	4	4	0%	0	4	4	0%	0	4	4	0%
13187	Lumpkin	5	2	-3	-60%	5	1	-4	-80%	5	1	-4	-80%	5	1	-4	-80%
KENTUCKY	County	MP	E	V	% V	MP	E	V	% V	MP	E	V	% V	MP	E	V	% V
21117	Kenton	18	49	31	172.2%	18	52	34	188.9%	18	46	28	155.6%	18	51	33	183.3%
PENNSYLVANIA	County	MP	E	V	% V	MP	E	V	% V	MP	E	V	% V	MP	E	V	% V
42017	Bucks	50	20	-30	-60%	50	18	-32	-64%	50	21	-29	-58%	50	19	-31	-62%

Variance

➢ 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.

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.

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

Scenario A

	Quarter 4			
	Modified Slots	Enrollments	Variance	Percent Variance
County X	5	3	2	40.0%
Change of 1 enrollment	5	4	1	20.0%
Trend	Q1	Q2	Q3	Q4
Enrollment	5	4	5	3
Percent Variance	0.0%	-20.0%	0.0%	-40.0%

Scenario B

	Quarter 4			
	Modified Slots	Enrollments	Variance	Percent Variance
County X	30	25	5	-16.7%
Change in 1 enrollment	30	26	4	-13.3%
Trend	Q1	Q2	Q3	Q4
Enrollment	20	22	19	25
Percent Variance	-33.3%	-26.7%	-36.7%	-16.7%

Scenario C

	Quarter 4			
	Modified Slots	Enrollments	Variance	Percent Variance
County X	15	10	5	-33.3%
County Y	30	35	5	16.7%
Trend	Q1	Q2	Q3	Q4
County X Enrollment	10	12	8	10
County X Percent Variance	-33.3%	-20.0%	-80.0%	-33.3%
County Y Enrollment	35	33	34	35
County Y Percent Variance	16.7%	10.0%	13.3%	16.7%

IMPROVING YOUR ED

- 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

PILOT PROJECT FOR COUNTIES WITH FEW POSITIONS

For additional technical assistance contact: FPO, NOL or SCSEPTechnicalAssistance@dol.gov
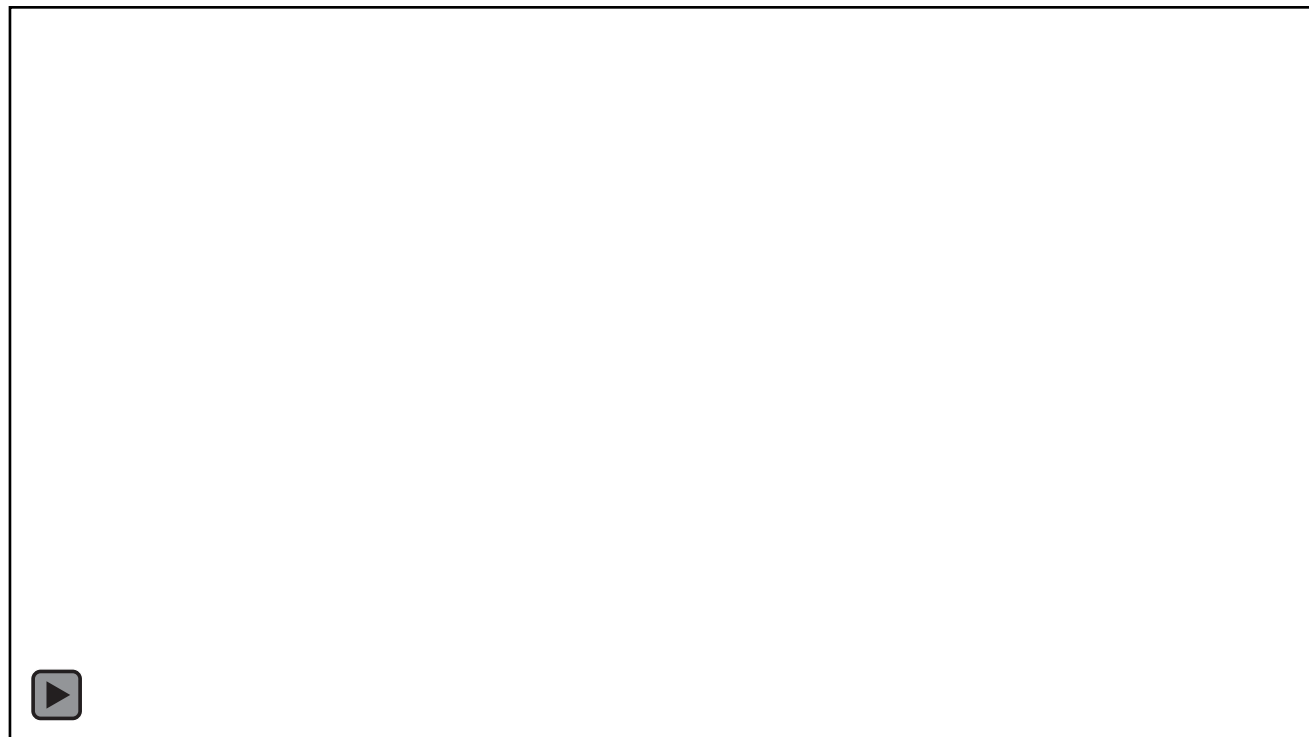
To access your ED data,
please go to SCSEPED.ORG