**WorkforceGPS**

**Transcript of Webinar**

**Equitable Distribution & the Senior Community Service Employment Program: What does all that mean?**

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JONATHAN VEHLOW: Welcome to "Senior Community Service Employment Program – SCSEP – Equitable Distribution." So without further ado I'd like to kick things off to our moderator today, Michi McNeace, technical lead, TwoTech, Inc. Michi?

MICHI MCNEACE: Thank you, Jonathan. And good afternoon, everyone. And again, welcome. Thank you for joining us today. Again, my name is Michi McNeace and I will be your moderator for today's "Equitable Distribution" webinar.

Our presenters for today will be LaMia Chapman, who is the unit chief for the Older Workers Unit that oversees the Senior Community Service Employment Program; and Bennett Pudlin with Charter Oak, who is one of our long-standing SCSEP subject-matter experts.

As you can see by our today's objectives, the presenters will demonstrate how equitable distribution is relevant not only to authorize and modify (positions ?), but how ED impacts your performance and service deliver.

Also, our presenters will provide impactful information and guidance on how to use SCSEPED.org to monitor your ED and monitor the variances between – from county to county, and how you can get the most from SCSEPED.org. Your presenters will also cover factors to consider when evaluating your performance and how ED plays a critical role in your overall performance.

In addition to that, our presenters will also cover the ED reporting requirements and ETA's expectations.

We would like this webinar to be very engaging. So therefore, after each section we will stop and take questions by using the chat feature that was mentioned earlier.

Now without further ado, I will turn it over to our first presenter, Bennett Pudlin.

BENNETT PUDLIN: Thank you, Michi. And good afternoon, everyone. It's wonderful to be with you, however remotely. I see we have a large and very diverse group of attendees today, and we sort of anticipated that. So we're going to start out with some really basic stuff. My apologies to those of you who are ultra-familiar with this, but there are a lot of names I don't recognize and I know there's been a fair amount of turnover over the last couple of years. So I think it's critical that we sort of level-set everybody.

So the starting point for our discussion today of equitable distribution is just an understanding that the Older Americans Act and the annual funding appropriation from the Congress determine how many authorized positions are available in each state and to each grantee. Once we're within a state, the distribution of those authorized positions to the individual counties is based on each county's percentage of the SCSEP eligible population in that state, as determined by the census.

And we don't look at the census data annually, but every time we do a national grantee competition, which is every four or five years by statute, is when we reset the entire nationwide equitable distribution using the most recent available census data. SCSEP-eligible population being those 55 and older and under 125 percent of the federal poverty level.

And so out of this calculation, the number of authorized positions that the appropriation will support in each county is set, and the grantees assigned to that county are then required by their grant to serve applicants and participants in accordance with the numbers in the county. And ED is designed to ensure that each eligible individual in a state has an equal chance of enrolling.

We know that nationwide we serve well less than 1 percent of the eligible population. As minimum wages go up and our appropriation tends to go down, we serve – and the elderly population continues to increase – we serve a smaller and smaller share. And so Congress has mandated, at least within states, that there be equitable access.

Unfortunately, Congress has not changed the statutory formula among the states and the authorized positions that can be funded go out to the states via formula that essentially locks in the distribution in the year 2000. As you can imagine, there's been major changes in the elderly poor population throughout the country since then, none of which is reflected in ED, unfortunately.

However, within the state, without ED or some similar mechanism, grantees would rationally want to serve where people were knocking on the door the loudest, where they have the best access to host agencies, or where there were the most jobs or placements.

So grantees are not expected to serve every county at a precise ED level at all times. That's not possible; it's not feasible. But grantees are expected to monitor ED on a continuous basis and to accelerate or slow down enrollment or even stop enrollment in given counties as necessary, to maintain the closest approximation of ED that's feasible.

One critical thing that can never be said too often is that no participant ever bears the burden of compliance with ED; that's a grantee burden. Grantees cannot terminate participants because their ED is out of whack.

I think one way to try to make sense of this requirement is to think of ED like the priorities of service that Congress has mandated in the Older Americans Act. So in the same way that we are obligated to serve people who have certain characteristics, we are also obligated to serve people based on geography. And in order to do that, you have to have a plan. You can't just randomly enroll people. If you take whoever walks through the door, your chances of meeting either the priorities of service or equitable distribution requirements are really quite minimal.

Similarly, ED is not something you think about only when you do your state ED meeting once a year and prepare your ED reports for DOL. It's got to be part of daily operations and managers at the local level have to be held accountable for meeting the grantee's obligation.

Just a quick overview of authorized modified positions. The statute talks in terms of authorized positions. Statutory formula uses the average unit cost that is divided into the annual appropriation to determine how many authorized positions there'll be in the country. And then they get apportioned out, as I said, by formula as well.

That unit cost is based on the federal minimum wage – (inaudible). Authorized positions, while we don't reset ED each year – as I said, usually it's about twice a decade – we don't have to re-determine the number of authorized positions whenever the available funds from the appropriation change, either up or down. That requires an adjustment to the authorized positions. We use the then-existing equitable distribution percentages, however, and apply the change in funding to those percentages.

Modified positions were actually created by DOL some time ago as part of our development of the new performance measures, because two of our measures utilize slots in the calculation. And we have sort of contradictory signals from the Congress, right? The authorized positions, as I said, are based on the federal minimum wage of $7.25; it hasn't moved in a very long time.

But we are also mandated to pay higher minimum wage – the highest of the local or state or federal minimum wage, wherever it occurs, whenever it occurs. And as you know, minimum wage is now – far exceeds $7.25 in the majority of states and increasingly in cities and counties. And for many years we've been tracking and incorporating those higher minimum wages into the modified slots.

As of July 1st, I think the highest minimum wages in the country are in several cities in California, which are now paying $16.50 an hour, compared to the federal minimum wage. That's quite a dramatic difference.

So we compare the applicable local minimum wage to the federal minimum wage. We derive the percentage by which the local wage is – federal wage is lower, and we use that percentage to then reduce authorized positions down to modified positions.

And because the modified positions reflect more accurately the number of participants you can actually enroll, for several years we've been using modified positions rather than authorized positions in our ED work, or at least in our ED reporting.

We're constantly asked, with regard to ED, how much variance from ED is permitted; what's the standard? And the simple as, there's no simple answer. It is complex. There are a variety of factors that come into play, including size of the county, its density in terms of the number of modified positions and participants or applicants who live there, the degree of under- or overservice we're dealing with, what the trend is over time, and whatever external factors – the economic environment or the administration of the program – might be going on.

We update equitable distribution in SCSEP ED each quarter with the posting of the current enrollment data. Authorized positions will remain the same throughout the program year unless there has been an approved slot in positions or, for some reason, we get a sudden influx of new dollars and we have to adjust AP. That rarely happens, but it's not unheard of.

Modified positions, we scan the states and cities and counties for minimum wages each quarter. And typically we'll do an update each quarter before we freeze the quarter for quarterly QPR.

Most critical thing to keep in mind is that all we can provide you through SCSEP ED or any other tool we create is a snapshot in time. And all that can do is show you how you're doing at the moment you look at it or at the moment the data had been updated. It is never going to give you a definitive answer.

And thus, it is critical that you look at performance over time, because at any given moment grantees inevitably will be under- or overenrolled to varying degrees. And what looks like good or bad ED performance can change in a day, in a moment, depending on what's going on in the grant. And it may mean nothing at all. So you've got to look at the trends.

I think at this point we're going to take a pause, Michi, and see if we have any questions.

MS. MCNEACE: Yep. Thank you, Bennett. We will go ahead and take some time for questions now. Just a reminder, if you have any questions, please type them into the chat box. And we'll give it a few minutes. (Pause.) I see somebody typing. (Pause.)

We have one question that came through. And the question asked, "How can we get Congress to change the formula?"

MR. PUDLIN: (Chuckles.) Above my paygrade. I sure wish somebody would. This has been the source of constant conversation in the national office for the whole 17-and-a-half years I've been there. And every year it becomes more and more urgent for two reasons.

One is, as I said before, while I think ED may have some justification at the state level, it makes no sense to try to equitably distribute the resources at the state level if their shifted to the state in an inequitable way. And as population has shifted across the country over the last couple decades, the statutory formula produces gross inequities between the states.

The problem of course is – the great strength of SCSEP is that every state is a grantee, right? And every state has two senators and 535 Congresspeople put together. And so nobody wants to mess around. Nobody wants to (trade ?) winners and losers. I don't know how that would ever happen.

The other factor of course is, as the minimum wage goes up and up and up, defining ED at the county level makes no sense at all because it's too small. And we have so many counties with no positions at all funded; they're below half a position. We don't do half positions; got to have whole positions. And so over time, it's – something will have to be done.

LAMIA CHAPMAN: So I want to add to that, Bennett. I also want to add that your descriptions on the ground helps us to make a case. That's why it's important for you all to tell us what's happening on the ground, so that we can look at the trends, how long it's been happening. So that's important as well.

We take your information and gather it and then move it up the chain of command so that we can give them a picture of what the changes have been over time.

MR. PUDLIN: Great point, LaMia. Absolutely. A couple of questions about if there's no simple standard, how do we know if we're doing right? We're going to get there in a minute, so hold that.

And one more and we'll move on, "Will Congress be using the 2020 Census for ED?" I think I answered that. And the answer, unfortunately, is no. We'll not use it directly because we've just done it and it won't be out for quite a while. I don't want to get into what it's going to look like; that's very much under dispute right now. But it will be incorporated into the census data that we use the next time we reset ED.

If people really have technical questions about that, they can contact Michi and we'll give you more details. But I think at this point we need to move on so we have time at the end for further discussion. Is that all right, Michi?

MS. MCNEACE: OK. Thank you. Yes, sir. Now we're going to go ahead to our polling question.

MR. PUDLIN: Yes, please.

MS. MCNEACE: So Jonathan, if we could go to our polling question. And our question for all of the attendees is, "How comfortable are you with using SCSEP ED?" Are you a power user? Advanced? Intermediate? Novice? No vote? (Pause.) They're coming through. (Pause.)

So it looks like –

MR. PUDLIN: A lot of you haven't answered yet.

MS. MCNEACE: Yeah. It looks like it's good that you're going to cover SCSEP ED because 40 percent for the novice category.

MR. PUDLIN: OK. Five more seconds. Get your answers in. Very helpful.

MS. MCNEACE: Yep. All right. So novice seems to lead.

MR. PUDLIN: Yeah. And novice and intermediate together are over 50 percent. So at this point we're going to try something very daring. Jon, if you could enable screen-sharing, we're going to take a chance. And I hope you can all see the home page for SCSEP ED.

MR. VEHLOW: So Bennett, just click "share screen." It's up on the main screen there.

MR. PUDLIN: I'm sorry. I neglected to do that. Thank you very much.

MR. VEHLOW: And I'll let you know when we see your –

MR. PUDLIN: Should be coming through any second.

MR. VEHLOW: I see it now, Bennett.

MR. PUDLIN: Thank you kindly. I hope you all can. So this is the home page. I'll just really quickly walk you through it.

It's got a What's New section where we just announce when we've updated data. Then a little overview and then a description of the main functions, which I will walk you through; the different sets of tables, what they are for, what they contain; what the map is and how to use it; and then how you can download data.

So let me start by just giving you the view. We'll do authorized positions by state. So there are two sets of use here for authorized and modified positions. There are authorized and modified, as you can see, separate items in the menu, up at the top in the yellow band. But the view is identical when you're looking at modified by state or authorized by state.

And by state means just what it says. You can pick a state; and if you're a state grantee, that's what you'll be doing. And let me take us to Massachusetts because we're going to just try to be consistent in showing the data.

And what you see here is you get the name of each county – oh, obviously, you pick the state, you pick the year, you pick the quarter. Default to the current quarter. The FIPS numbers are the official census codes for the counties, very handy for matching purposes so that you don't have to rely on county names.

And then for each grantee in that state, you're going to see three sets of columns. The first set is – I'm sorry. You're going to see three columns in a set. The first set is always reserved for the state grantee; SG is state grantee; authorized position is AP. And so you see for each county the number of authorized positions that are in your grant for that quarter.

State grantee E stands for enrollments. These would be the enrollments typically on the first day of the quarter. In this case we updated them – because it's the last quarter of the year, we updated them with the last enrollments as of the last day of the year. And the What's New on the home page should have told you that.

And then the state grantee V – V is for variant – tells you the difference between the number of people you've enrolled and the number of authorized positions you have in a county. And obviously, if you've enrolled fewer than you have, the variance is going to be negative. If you've enrolled more than you have, then it would be positive.

And usually down at the bottom you would see – don't know why it's not here – what the net variance would be for the grantee. You will see that up in the state summary, which I'm going to show you later.

Modified positions by state work exactly the same so I'm not going to take the time to show you that. But I do want to show you the other view, which is modified positions by grantee. So here you have the same options of year and quarter; but instead of selecting a state, you're going to select a grantee. And here I'm picking OAGB – Operation Able Greater Boston – which serves Massachusetts.

And what you're seeing is the same data that you saw in the view by state, except here you get all available quarters of data. It doesn't matter what you pick as the dropdown. I could have picked quarter one of '19; it would still have populated all four quarters because we're now past the fourth quarter. Again, you get the number of modified positions in each county, in each state, the enrollment, the variance.

And here you do get the net variance, right? So 2-7=-5; -6+1=5 – you get a -5. And then you get the percent of variance, positive or negative, in each county. And you get the same information for each state.

OK. So let me show you what the summary table looks like. The summary is the same no matter what view you're in, whether you're in the tables – positions by state or positions by grantee. The summary is going to tell you for each – if you're a state, there'll only be one row for you.

Let me go back. There's a slight difference and the states probably want to see that.

So in the summary for the state grantee, the first row is you and it's going to give you either your modified or your authorized positions. In this case we're looking at modified. Your total enrollments and the net variance at the state level; in this case it's -8. You take all the pluses and minuses and just combine them, you get a -8.

It tells you the number of – this is Alabama, but it's the same thing – number of counties that the grantee serves. Of those counties, how many are underserved and what percentage of the counties that underservice amounts to. And what's the average degree of underservice – this would be underservice, so it's negative, right – in those 20 counties, in this case. And then it gives you the same information in terms of overservice. How many counties out of the 43 are overserved and what the percent of overservice is and – in those counties – and what the average percent is.

And then here we get the combination of total number of counties that are either over- or underserved. And the point of this is overservice is no better or worse than underservice. They are both variation from the standard you're trying to hit. And so we combine them and we then tell you what percent of your 43 counties are either under- or overserved.

And then this may be the most important measure – or at least the most useful measure. It takes the absolute value of the underservice in all the counties. It doesn't net out the positive and the negative; it adds up all those numbers without regard to directionality, and divides it by the number of modified or authorized positions that you're dealing with and gives you a percentage.

This standardizes the degree of over- or underservice and enables you to do comparisons, to look at your own performance over time, when the numbers have shifted, but also to compare yourself to others. And we will talk about that in a minute. Yeah.

So now let me go to the positions by grantee and show you – well, let me go back here for one second. I apologize.

Below that you see all the national grantees. Each one of them is listed separately here. So we have Easter Seals and SSA – we're now in Alabama. Same three columns of data, but they're combined. And this is really for purposes of the state ED report, which we're not going to get into today but we will do at a later date. We'll talk about that at the end of the presentation.

So you're seeing the same data for all the national grantees serving your state in the aggregate. And then you're seeing the state grantee and the national grantee combined to give you the total state ED, which is what you'll be looking at when you do your state report. If there were set-asides, they're not subject to ED, but we do show their data. It's not fair to call it ED because they're exempt from it by law. But it does show the extent to which they are serving in the counties the grant funded them to serve.

So we're going to see exactly the same thing when we do – the difference here when we do the modified positions by grantee, as opposed to by state, is you're seeing a separate row. In this case – again, this is Operation Able Greater Boston – separate row for each of the states that it operates in, along with a summary of all the data for all those states, and below it is the data state-by-state.

OK. I think – oh, yeah. So downloads. Different kinds of downloads. If we're looking at the view by state, you can just click on this button and you'll see a download of the state you're on. And it will give you the state grantee and the data for all the national grantees in that state.

When we get to the view by grantee, you have a broader range of options. You can export just the detail table that we looked at a minute ago. You can just export this table. And again, it's going to print out all available quarters, no matter what you chose here. You can just get an export of the summary or you can export the summary for all grantees.

And at the bottom of this dropdown you'll see there's an option for state grantees, even though this view was designed for the nations. If you click on this, what you'll get is all the state grantees in this format listed one after the other, and the summary will contain data on all of those.

And then finally, you have the option to download – there you go – download the entire file. So you would get all the states with all the grantees. And you'll see that there is no grantee in the state; data are blank.

And then last, let me show the maps. It's really pretty cool. In order to visualize where you have positions – maybe less useful for you than it is for the national office and your FPOs. Takes a while to load; it's an awful lot of background data that has to get processed. So bear with me.

So we're talking about OAGB, which serves Massachusetts and New Hampshire. So if you noticed what I did, on the national map I just hovered over a state and clicked on it. By mistake I clicked on Vermont. It brings up that state and, if it's small enough, the surrounding states. So we're seeing Vermont in the middle and New Hampshire on the right. And you'll see the positions are color-coded. The brownish color coding is OAGB; and these two in the middle have no national positions, meaning they just have state positions, and that's indicated by the square.

And you'll see from putting the cursor over a county that there are no state positions in Grafton that I'm hovering over now, but there are 15 national ones and they all belong to OAGB. And there are 29 enrollments. And if we were to come over to a state, Merrimack you can see the same data.

So to come out of that you just click on the center of the compass rose and things should back up to the nationwide level. There are detailed explanations of how to use the map, but it should be very handy.

Jon, at this point I think we can stop screen-sharing if you bring me back to the slides.

MS. MCNEACE: If you would just go to slide 26, Bennett.

MR. PUDLIN: Actually, we're going to start at – yes. Where are we? A little too far.

MS. MCNEACE: There we go.

MR. PUDLIN: One there. All right. This is the export. Can everybody see the slide now?

MS. MCNEACE: Yes.

MR. PUDLIN: Yeah. So what you're looking at is an export. It's in a CSV file. Just a caution, when you get it you'll want to change it to an Excel file when you save it, or any changes you make in formatting will not be saved. And it may be a little hard for you to see, but let me see if I can –

It gives you the same information you saw on the screen. You have the FIPS, the county name, the state. You have the state grantee, three columns of data, any national grantees. I think – yeah, we're dealing with Alabama, so you see Easter Seals data. And if there's another one – I believe there was a second one – it's somewhere to the right. But that's what it would look like.

Let me just end this section by saying, as helpful as – (inaudible) – is, I think the data are critically important. It's not going to be adequate, I think, for all purposes. And we would encourage grantees to develop their own templates for working with their data. Here's one that the national office and I put together just as a possible example of what you can do. I'm assuming everyone can see this. Michi, is it coming through all right?

MS. MCNEACE: Yes.

MR. PUDLIN: Great. So here, in the first column you're seeing time periods, right? So we – you were doing this in the third quarter of PY19 and for comparison we picked the last quarter of '18 and the last quarter of '17. We only have modified positions going back to '17. We have authorized positions going back to PY12.

So then we pulled all of the data in the columns through P. We pulled out of SCSEP ED. So we have the number of modified positions in the first column, number of counties served, the percent of counties, underserved percent of counties, overserved, average degree of underservice, average percent of overservice, and then that total absolute variance divided by the number of modified positions.

These are real data, by the way. And so you can see some of the variation. Once we looked at live a minute ago we're in the 30s, here we're in the 60s. Very high degree of absolute variation.

And then we created some buckets to try to make sense of the under- and overservice. How extreme is it, right? And so what we did was – and this is completely made up and you should feel free to use whatever clusters make sense to you. But we worked with underservice and we said, what would be totally extreme?

And anything from 90 to 100 percent underserved, right? What percent of the counties fell into that bucket? And the number here is 16.7 (percent). And then what percent were underserved between 50 and 89 percent? That's about 20 percent. What percent were underserved 20 to 50 percent? That's 43 percent. What percent were served under 20 percent? And that's 21 percent.

So at a glance, this says you've got a problem area potentially here, with 17 percent getting essentially no service. And then you've probably got something close to normal variation with 21 percent. And then you've got some stuff in the middle that's more ambiguous and needs more examination.

You could use the same buckets – I would use the same buckets for overservice as under because, again, there's no difference between the two in terms of complying with ED.

And then these last columns at the end are things that we constructed that weren't presented in SCSEP ED directly, right? So how many counties – the data are here, right? For this one. How many counties and what percent of your counties had fewer than five? You pick the magic number. We're looking for a number that says, this county is so small, it is hard to get a reading on what's good compliance and what's not, right?

And then we said, let's look at density. Let's look at the average number of modified positions per county within the state we're serving. And you can see that they're hovering around 7 percent here.

And then we looked at ruralness. What percent of the state is rural? This we did quick and dirty, which is not the right way to do it. We pulled this out of the percent rural in the QPR. But that's just telling you where people live; it's not telling you the characteristics of the counties themselves. It says what percent live in rural counties.

What I would do is I would actually go into the RUCA codes, which you can access through SPARQ or you can just pull a link there and access them offline, and see what percentage of your counties are considered rural. Because obviously that – rural counties can be much more difficult to serve and they need a different strategy.

So I think with that we may have – yeah. And I did the map, so we're good. This is just a summary of the data you'll find – the information you'll find in SCSEP ED about how do you work with the maps.

And with that, we can pause for more questions.

MS. MCNEACE: Thank you, Bennett. That was some really great information you shared. But yes, we are going to go ahead and take some questions at this time from the audience. And I do see that we do have a couple.

One question asks, "Can you review how to interpret the total variance modified position data?"

MR. PUDLIN: Yeah. So it is a summary number that says we don't care about underservice versus overservice; we care about variation from the standard. ED being the standard, right? And we take the absolute value, which is to say we – again, we disregard over or under. That's what we mean by the absolute value.

We take the total number of enrollments that are below the modified position count and the total number that are above and we combine them – the absolute numbers and combine them. And we divide that by the number of modified positions because that's why it's so hard to have a simple standard.

Every grantee is of a different size. So we don't know how many positions out of whack you can be and still be OK. So by creating a denominator with the modified positions, we're kind of standardizing the analysis to enable comparison not only against some other grantee, but against yourself over time, because your modified position count will change as the minimum wage goes up or as the appropriation goes up.

So – (inaudible) – a ratio. It's a rate. It's like an entered employment rate, right? That's why I think it's so useful. It's a gross number and it doesn't tell you the whole story. And we're going to see in a minute what other factors you need to look at to explain what's going on. But that's in a nutshell why we use it.

There's also a question about using the reports. And you do have – and I think we'll talk about those at the end, so I don't want to waste time now – or spend the time now. You do have instructions and they call for you to use the most recent data. Quarter one PY20 data will be posted shortly.

I should tell you that we're bringing down SCSEP ED probably tomorrow for some critical maintenance. We expect it will be up no later than Monday. Once you take it down, it takes several days for it to re-index before it be visible. But we're hopeful by Monday. And we hope we will have the quarter one PY20 authorized positions and enrollments as of August 5th posted on SCSEP ED.

We will have the modified positions for quarter one as soon as they are available. We are producing them now. They will be used – they'll be uploaded into SPARQ shortly, within a week I would say. And at the same time they are uploaded into SPARQ, we will upload them into SCSEP ED, because you're going to want to work with – those of you who have minimum wages other than the federal are going to want to work with modified.

So always when you're doing your ED report, you want to use the most recent quarter that's populated in SCSEP ED for your analysis – the starting point of your analysis.

MS. MCNEACE: OK. Great. Thanks, Bennett. So for the sake of time we have a couple more questions. But you want to hold off on that until we get through the performance section?

MR. PUDLIN: Yeah. I think the next one will be when we're done with –

MS. MCNEACE: OK. So now we're going to be moving on to analyzing ED performance.

MR. PUDLIN: Yeah. And here I want to be really brief because I think I touched on a lot of this and I want to leave ample time to get your feedback. I want to hear what you've been using, what you consider more useful.

Again, the starting point is there is no simple standard. And it's complex. And you've got to find a way to wrangle that complexity into something actionable. And so we've suggested that you come up with your own clusters – we've given you an example of what they could be – for the percentage and degree of under- and overenrollment.

We've talked about the total variance, especially as we present it, divided by your modified positions. It's done for you in SCSEP ED.

Percentage of counties with very few slots. If you have the majority of your counties are tiny – and there are states with huge numbers of counties and, for whatever reason, the state grantee has to be – or thinks it has to be – in every one of them. And so it winds up having counties of one, two, three, four, and hardly any that are double-digit. That's sort of – and we understand there are always historical and political reasons for that, but it really is shooting yourself in the ED foot. You need to know that. It's going to make your job that much harder.

We talked about the density, your average MP, which is different from the number of counties with very small number of spots. Talked about ruralness. And it's probably not adequate to do it at a state level because so many states have large urban areas but also have huge rural areas. So you probably have to do it by county.

Most important of all is the trend line. And I can't stress that enough. A single point in time is almost never going to be reliable, never going to be an adequate basis for your investigation.

So the extremes, we talked about that. When you're at the extremes, nothing speaks more powerfully than 0 percent or 100 percent, right? Those are usually the only data that answer questions, especially if they're over time.

So if you've got a couple of counties or a bunch of counties that show 95 percent or 100 percent underservice or overenrollment in the quarter you're analyzing, and then you go back over time and you see that same number repeating quarter after quarter, year after year, unless you can come with some powerful environmental circumstances or some administrative issue that got in the way, your presumption has to be that it's a disregarded ED. That the operator in that county is not mindful and is not making efforts to address ED.

And then always look for the relevant comparison. Your own performance over time is the first one. But then yourself to others. You can look at the nationwide performance. If you're a state grantee, you can look at the aggregate state grantee performance. If you're national, look at the aggregate national grantee.

And if you have a peer group – one or more grantees that look like you in terms of geography, in terms of participant pool, whatever relevant factors you can think of – compare yourself to those relevant peers. And you really need to create your own standard.

In the next section LaMia is going to go over what's expected of you in terms of the analysis. But I would say that these two slides really have to drive your analysis because what you're asked to do is to identify what needs fixing and then propose how you're going to fix it. If you haven't done an adequate diagnosis, you're not going to be able to come up with a prescription to make the client healthy that has much of a chance of success. So this is where your energy needs to go.

So I'm going to stop right here, Michi, and let you take some questions. And comments. We really want to hear what people have used and what they think is most relevant and if they've had trouble trying to find additional supplemental data that they think would be useful. We can have a bit of discussion.

MS. MCNEACE: Yeah. Before we do that, Bennett, here's a question for you. "How does equitable distribution impact actual SCSEP performance, such as service level? Is there a correlation between the two?"

MR. PUDLIN: No, there's not. And so there's all kinds of performance, right? We think of performance in terms of the core performance measures, and those are really, really important. But they're not the only thing. You have a host of grant requirements that you are accountable for, the violation of which can put your grant in jeopardy. And one of them is equitable distribution.

And so when we talk about performance in terms of equitable distribution, that's what we mean. Are you maximizing the opportunity for eligible applicants to be served in your project? That is a specific, discrete, congressional mandate that you're accountable for. And that's what you have to do.

Quite frankly, you can – if you want to maximize your service level, I suppose you can overenroll, right? And that would increase your service level. But it would put you in violation of ED. But also kill your budget, I presume. So I think there's an indirect relationship that stays within reasonable bounds of your modified position count, county by county, will keep you within reasonable bounds across your whole grant.

But you could keep your number at a grant level and that would mask gross violations at the county level. So you could look great for service level or community service measure and have horrific equitable distribution because you grossly overenrolled in some places and you – you know, it's like you've got your left foot in a bucket of ice water and you've got your right foot in a bucket of boiling water. And you say, on average I feel just great.

Well, you could be doing that with your service level and hitting your numbers, but you could have half your counties underenrolled and the other half overenrolled and your ED is a disaster. So there is no simple correlation.

MS. CHAPMAN: I'd also like to say that it is a holistic approach of how you manage your entire program so it's not segmented. So you have to take all of these things into consideration. So it's a balancing act, like you said, Bennett, in making sure that everything is addressed at the same time. So it really is an overall approach on managing your data in ED – your performance data in ED.

MR. PUDLIN: Yeah. And as I said, if you think about ED – I know it's easy to dismiss it as some sort of compliance game. I think that's a huge mistake. And we try to say upfront, if you think of it as a fairness and equity issue, similar to priority of service. And I think you can train folks in the importance of paying attention to it.

You shouldn't be – and I hope you're not – just enrolling whoever walks through the door willy-nilly. You're mindful of the fact that you have to give priority to people who have a disability or who are LEP. In the same way, you can't just enroll people from whatever county they come from if in fact you're already overserving that county and underserving somewhere else.

So I think as LaMia said, it's part of good overall grant management.

MS. MCNEACE: So that goes to this one question where the question asks, "Is it understood that once we have met ED, the static number in any given county, that we have satisfied ED?"

MR. PUDLIN: God, no. (Chuckles.) Unfortunately, I wish I could say that, because it's not static. It's fluid. And that's part of the difficulty and I feel bad. I think you guys have the hardest job in the world. Managing this program is so complex.

If only you could say, phew, I hit it on the 30th day of June and I never have to worry about it for a whole program year. It's going to change all the time. It's living, breathing, and you've got to go with it. That's why you have to train your local project folks to constantly be conscious of where they are in terms of ED, just like they have to be conscious of are we enrolling people who are hardest to serve?

If you don't pay attention to that, you're going to get the people who are savvy enough to go find you on their own. Or lucky enough to have been referred by some other case worker. But the people who are most isolated are never going to hear about you. And if they did hear about you, would figure you wouldn't help them anyway. So you have an obligation to go make yourself known to those folks and invite them in. And ED is the same way.

MS. MCNEACE: Well, thank you. Thank you. So for the sake of time, we're at 3:29 –

MR. PUDLIN: Hang on a second. I just want to say, this last question needs an answer. You don't get to negotiate a new ED. ED is what the census says it is. You can't fix an ED problem by saying, I'll just shift the positions to another county.

LaMia's going to talk to you about what you can do in general to make it easier to comply with ED. But you can't just move away your problem. So with that I will turn it over.

MS. MCNEACE: All right. Thank you. Great answer.

We have another polling question that's come up for grantees only. "How many grantee ED reports have you submitted to DOL?" (Pause.) So LaMia and Bennett, is there a right or wrong answer here?

MR. PUDLIN: (Chuckles.) No. It just confirms what we saw before. We have a lot of folks for whom this is new. Or not entirely new, but still not real familiar. So I think it's a good thing we have so many folks on the line today.

MS. CHAPMAN: Yes.

MS. MCNEACE: Yep. That's great. So this is a great segue for our next presenter. So thank you, Bennett. If anyone has any questions for Bennett, please type it in the chat and we can address it later on, once we're done with the ED reporting section.

And so our next presenter will be LaMia Chapman, who will cover the ED reporting requirements and expectations. So LaMia, it's all yours.

MS. CHAPMAN: Thank you, Michi. And thank you, Bennett, for going over this in depth and having this available for our grantees to refer back to.

So good afternoon, everyone. A while back we had some discussions with you all about equitable distribution and some of our intended changes. We've made some minor changes to the forms and instructions with the intent to integrate training with the program expectations as how to submit an acceptable report.

So fast forward today. With most of our undertakings completed, we are now rolling out the necessary training we acknowledge you all need. So over the past several months we've been reviewing the equitable distribution reports for program year '18 for both state and national grantees. We've met with some of the regions to go over our findings on the national grantee ED reports.

So we wanted to provide you all guidance on how to write up and submit your reports to the national office. Therefore, this portion of the presentation will focus on our aggregate findings rather than individual findings, which will include some of the successes and challenges that we've noted in the reports.

So the last program year '18 reports will not include any of the circumstances as extreme as what we've been dealing with beginning in February and March. But we do want to acknowledge that those areas that have been served – that you all do serve – have nuances that are germane to your successes and inability to service those areas. So we will see some different languages because of what we've been going through as a nation with the pandemic. But I'm going to talk to you about pre-pandemic situations in the reports that we've seen.

Can you go to the next slide?

So without reading the report, as you all are aware, the equitable distribution report is required by law. And so this report – what we would like to see is that this report should explain to us the movement of participants, or the lack thereof of movement of positions – that are assigned. Like the participant positions that are assigned.

It should be clearly delineated in your narrative as to why certain positions haven't been filled and your attempt to getting them filled. Any impediments as to why getting them filled for more than two program years or how you've seen it.

Because again, we review the information from that program year back to maybe two programs behind. So we look at program year '18, '17, '16, just to get an understanding of what your – what has been reported in the past and what is reported now. So we do look at, at minimum, two program years. And why you all are overserving counties that have fixed numbers of positions, but that you all are serving well above those positions.

So these reports are collaborative in nature, given that you may (sub ?) to some nationals serving in that same area. Next slide.

When looking at the ED summary variance table, the last cell should contain the total absolute variance divided by the modified positions, according to the definitions listed on our SCSEPED.org website. As a reminder, please be sure to indicate the time periods used and make changes as needed.

So during our review we found several reports that were provided by the grantees that did not fully provide information on the variances in certain counties. We consider this information incomplete and that will be one of the reasons why we will return the report to you, as you all are more aware of what goes on, on the ground in those counties than we are.

But what we're looking for from you all is a story to tell us what's going on, what your efforts have been, and what you intend on doing to address the situation, whether it's under or low.

And again, this is something we look at two program years back. So we're not taking one – what is it? One report and looking at it and making a decision on that. We're taking all the information that we've received from you all, looking at it, going back maybe two program years, maybe even three program years, to see what has been addressed.

So an example of this we can tell you is an ED report that restates the SCSEP data, and that the report is showing inadequate information on the timelines to address the needs of the deficiencies in the variances. So you all may submit something that reads the same thing that the report has already shown in the analysis portion as you read out.

So for those reasons, that the overenrolled counties were not provided, again we know it's a point in time but we need that information to tell us why. So if there's been, like, four quarters before you submitted this information that says the same thing in PY17 as it does in PY18, it's a real glance, as we've talked about in the past, that there's been very little to address it.

Like your methodology hasn't changed, your approach hasn't changed, you haven't done – you haven't at least expressed to us in writing what you've done that have changed it. It is only repeating what has been taking place for the last two quarters before we read this one.

So we'd like you all to do it to give us – or elaborate more on what is going on, what you're trying to do, what you have done, or what you intend to do. And again, if these areas are hard to serve, indicate that. Let us know what is actually going on on the ground so that we can either provide additional TA or take that information and use it so that we can document it and prepare it in a report.

Another example based on our review of the PY18 reports presented was second quarter data rather than third quarter data, as specified in the instructions. It's important to read the instructions and provide the information that we asked for. Giving us second quarter data when the report asks for third quarter data. So that would be assumed that these mishaps would be returned for corrections.

We've also noted that there were a number of reports that the summaries of variances did not match the numbers in SCSEP ED. So I know that – I think to Bennett's point, you all create sometimes your own reports and you look at them. So when we look at the reports from ED, we see there's a difference.

So what ED shows and then what you all have is totally different. So we want to make sure that we use what is in ED so that we can – so we don't want to make any assumptions and send back your reports for corrections. Next slide.

So a plan to improve ED in your project. When we look at ED performance, we review the factors to consider in evaluating performance, as shown earlier by Bennett. We look at different pieces of your analysis, including counties with substantial and meaningful variances. We look at counties with variances that are not substantial but meaningful. So for both situations we want you to be sure of how you reach your conclusions and provide insight on the causes of variances.

So for example, based on our reviews, some grantees might have their own internal thresholds that they're using as a determinant of what they consider variance. Sometimes we hear something more than 20 percent variance, more than 30 percent variance. We're not privy to your internal thresholds. And we want you all to really show us or explain to us what's happening on the ground

So let us know, again, what it is that – looking at this current year, looking at your past current year, if the variants have been the same, what is actually going on? What have you noted? What are your attempts to do in order to address this, if at all, if there is anything that you can do? And we want you to let us note this.

So for states, if you all mention in your state plan that you track all of this information and you talk about a long-term strategy, but when we look at your ED report and we don't see that you're addressing this or you're trying to address it, then you're not equitably serving your rural or – (inaudible) – populations. Or at least you're not conveying that to us.

So if you have or receive any approvals – or even still, if you need to want to change or equitably serve other areas – you can at least make that request to the national office of any movement.

There's also some reports that restate data found in SCSEP ED but fail to provide an explanation of variances, of why it's overenrollment or underenrollment, why several counties that did not enroll participants for program year 2018, program year 2017, program year 2016.

When you go four consecutive quarters with no enrollments, at least we should see a real rational explanation as to why. What was any implementations done, any improvement on what has happened internally as to address these situations, what steps you will take. So we'd like to see these.

Again, you all are the experts of what's happening on the ground. All we're asking for is to give us an explanation. Tell us so that we can at least understand what steps you're taking to address these issues. And it shouldn't be the same thing for program year '18 as it was program year '17 as it was in program year '16. That means that whatever you're actions you're taking isn't working. Next slide.

So again, potential actions to improve ED. As you can see, one of the things that you all can do is seek technical assistance to get some help; consolidate positions, including swapping with national grantees. Again, that requires approval, but at least you can make that recommendation and we can look into it. Multiple subrecipient versus consolidating subrecipients.

Providing larger serving areas to subgrantees with a mix of large and small counties may facilitate the expenditure of grant funds. This approach may also minimize the reduction or increase the number of participant hours toward the end of the program year.

We do want to caution – last one is that DOL does not allow transfer of grant funds from one grantee to another in order to make up for violating ED. And DOL will not – I'm sorry, we will strictly scrutinize transfers from one subgrantee to another that are intended to address under- or overenrollment that violates ED.

This is the end. I think I have one more slide, Michi.

MS. MCNEACE: No, ma'am. This is it. We're going to –

MR. PUDLIN: That's it.

MS. MCNEACE: – open up for questions at this point in time, unless there's anything that you or Bennett wants to add regarding ED reporting.

MR. PUDLIN: I do want to just – something LaMia said just in this last slide prompted. I want to apologize. I think I misread the prior question about moving – negotiating a movement.

It is certainly possible, as LaMia said, to rationalize your territory. We've been encouraging grantees to get rid of small – counties with small number of slots and to combine them with other counties in terms of subgrantee service areas, that sort of thing.

Because of the national competition – and I think this is in the instructions – no swaps are permitted during the national competition. But every time we do this, there will be a period once the awards are announced where the national grantees get to negotiate swaps among themselves within a state or even across state borders. And then the national – and the state grantee then gets to negotiate swaps with a national grantee.

So you'll have an opportunity to do that. The department has been encouraging you to do that in ways that would make it easier to comply with ED and lead to more efficient service delivery. So that time will come. But unfortunately, it can't happen now, so it's going to be a while before that can happen.

I also wanted, Michi – unless you were going to cover what's next?

MS. MCNEACE: Yes.

MR. PUDLIN: I think you've got that coming. So I'll hold that for you. And there was one other question that came in that needed clarification.

So if the trend is OK, does that mean the point in time doesn't matter? The answer is yes, but only if you tell us that.

MS. CHAPMAN: Right.

MR. PUDLIN: Because you've got to do your job. Don't put it on us. Don't make us look at the current quarter in SCSEP ED, see that your performance is terrible, and then you don't tell us anything. As LaMia said, if it's not important, tell us why.

And all you've got to do is say, this was an anomaly. It happened because the manager had a heart attack and was out of the office for three months. I don't know what it was. There was a natural disaster and nobody could get assigned to a host agency. Pandemic, whatever. You tell us. But yes, the trend, that's part of the analysis to say, I know it doesn't look good when you just look at this one quarter, but here's why you shouldn't be bothered. And then it goes away.

MS. MCNEACE: There's one other question that says, "Please describe an explanation of DOL's technical assistance in this area."

MS. CHAPMAN: Sure. And I think that that's something that we all collectively can work with with the grantees. Each grantee has different nuances that happen on the ground, different scenarios and different situations. It may be an issue with recruiting in a rural area. It may be an issue where there is just a heavy need in an urban area and you want to be able to see how you can address more people, then offset that at the end of the program year. It could be a myriad of different scenarios.

And so what we do at the national office level is to look at all the information that we have you all submit to us or is collected through SPARQ. And then we can look at your narrative reports; we look at all this information. And then we sit down with you, listen to what the issue is, and then work with you all with whatever your scenario or situation is.

So I hope that that helps without very pointed as to what type. But that's how we address it.

MS. MCNEACE: Great. Thank you. So we're getting ready to conclude. And so the next slide would be to talk about what's next, LaMia, on the grantee reporting for states versus national.

MS. CHAPMAN: So I believe there's an ED instructions attached with this file attachment within this webinar. So please make sure that you review that.

So the grantee ED reports we will start 2020 – will begin shortly. And we will be giving you all a date on when that's due.

MR. PUDLIN: The date is in there. I believe it's October 18th?

MS. MCNEACE: 12th – October 12th.

MR. PUDLIN: 12th. 12th, thank you.

MS. CHAPMAN: October 12th?

MR. PUDLIN: Yeah.

MS. CHAPMAN: OK. So date is due October 12th. For the state grantees, correct?

MR. PUDLIN: Only the state grantee and only the grantee report.

MS. CHAPMAN: Right. And so I would suggest if you all are struggling or having some issues, please let us know in the SCSEP technical assistance box so we can start to help you look at – work with you all, at least, to see what type of assistance you will need. If it's just making sure that you provide the necessary detail as to what's going on with your variances, with what's happening in terms of recruitment, what's not happening. If you all can send your requests through your SCSEP box and copy your federal project officer and your (NOL ?), that'll be helpful for that piece.

MS. MCNEACE: Right. And for national grantees, they will not have to submit an ED report until their new awards are made, correct?

MS. CHAPMAN: Exactly.

MR. PUDLIN: Yes. We – yeah. And we will be putting out additional information at that time about when that'll happen. We don't yet know from the grants office – we don't have awards, obviously, and we don't know when the transition will physically occur on the ground. But we need to give the national grantees time to make that transition and to get to know their new territories before they can talk intelligently about their ED.

So we will work with them closely. And when that's ready, there'll be new instructions. There'll also be a repeat of the training for national grantees because we didn't encourage their attendance today.

And we'll also be sure to include a segment on the state ED report, which we deliberately did not cover, which is the collective report of the state grantee and all the national grantees in that state, about how they're collectively going to improve ED and collectively improve their efficiency.

So all of that is going to come, but we can't tell you exactly when because we don't have a date.

MS. CHAPMAN: Right. I do want to make sure that we emphasize when you say "collectively," that you guys are working together. And if there are any recommendations that you want in those reports, please put them in there clearly.

Often times we've found out that grantees have made statements in these reports assuming that they were approved by the program office. You will get a letter back saying that – if your recommendation of what you want to do has been approve or not. We will let you all know that, OK?

And if it's something that has been overlooked, just please notify your FPO and your (NOL ?), send it to the SCSEP technical assistance box to raise it to our attention that you are waiting on an approval of either a swap or one of the recommendations you put inside your report.

MS. MCNEACE: OK. Thank you, LaMia. We have one last question. The question is, "Will there be any consideration given for COVID and ED?"

MR. PUDLIN: Yeah, of course. I mean, one of the slides – I forget which one – said look at environmental factors. And I think I mentioned natural disaster or pandemic, right? Yes. Obviously, if host agencies are shut down, then it's really difficult to enroll people. And underenrollment can't be addressed if you can't enroll. So clearly, that's something you'll need to talk about.

But as LaMia said, that accounts for today. If you're dramatically underenrolled in the county for the last three years, don't blame it all on COVID, right?

MS. CHAPMAN: Right.

MR. PUDLIN: You still have to address – there was no COVID three years ago. So yeah. I mean, absolutely. It's going to impact everything related to SCSEP performance; we just don't know the extent. And I know as Stephen (ph) and LaMia said on all-grantee calls, whatever it is, we'll account for it when we get there. But it's very hard to predict what the impact will be.

So I just want to –

MS. MCNEACE: We have one more question.

MR. PUDLIN: Yeah. I see the – no. The state ED reports – the question is, "Are the nationals going to have to work with the state on the state ED reports?" We try to make it clear that only the grantee report is due on October 12th from state grantees. The state report – so this – we probably weren't clear enough.

Two different reports. Every grantee, state and national, does a grantee report. The state grantees do their grantee report on October 12th. The national grantees do not do a grantee report until instructed after the competition is over. And the state grantee is responsible for issuing the state report, which is a collective effort of the state grantee and the national grantees. And that too has to wait until the nationals are in their new territory. They don't even know what states they have to participate in.

MS. CHAPMAN: Correct.

MS. MCNEACE: Great. Thank you. Thank you. Well, this seems to conclude our webinar for today. So we would like to thank each and every one of you for participating and thank you for all your wonderful questions.

MS. CHAPMAN: Thank you so much.

MS. MCNEACE: So with that being said, thank you, everyone. Stay safe. Stay well. And if you have any questions, please again send those questions to SCSEPTechnicalAssistance@dol.gov and we will respond accordingly. Thank you, everyone.

MS. CHAPMAN: Take care. Bye.

(END)