

## **Program Year 2020 Senior Community Service Employment Program (SCSEP) Equitable Distribution Report Instructions for State Grantees**

### **Overview**

In 2012, the Department of Labor created an online Equitable Distribution (ED) tool to assist SCSEP grantees with ED reporting. The updated tool uses the latest Census data to display ED within all counties in each state and SPARQ data to reflect enrollments by quarter. Tables and maps showing authorized and modified positions and enrollments for each county, as well as summary information and variance calculations, are available at [SCSEPED.org](https://www.dhs.gov/scsep). Grantees must use the information in the tool as a basis for their report. The Q1 PY 2020 tables reflect the PY 2020 state grantee positions and enrollments as of August 5, 2020. Grantees must attach the last quarter of the modified position tables, downloaded from [SCSEPED.org](https://www.dhs.gov/scsep) to their reports.

Please remember that SCSEPED.org only provides quarterly snapshots. Reporting on Q1 or Q2 PY 2020 will enable you to describe how well you are meeting the PY 2020 ED requirement at the beginning of the program year and what steps you will take to improve during the balance of program year. However, especially when you discuss the significance of the variance in Section II of the report, be sure to consider your performance quarter-by-quarter over the last few program years. If the degree of variance in some counties has been problematic over time, even small variance in the latest ED data may warrant attention.

Please note that Part II of the ED reports requires you to analyze your ED performance over time, determine if any variance is significant, and if so, explain the reasons for the variance. The ED training provided on August 11, 2020, identifies a number of considerations that you should address in doing this investigation and coming up with your diagnosis. Part III of the report requires you to detail what you will do to correct any deficiencies identified in Part II. Your action plan should respond to the specific causes you identified in Part II. Again, the training provides a number of considerations that you should address in Part III.

We hope that the data help identify problem areas and that the summary measures that calculate the ED variance are useful in your analysis. The state meetings that occur before the state reports are submitted before the end of this program year provide an opportunity for the state and national grantees to explore opportunities to further consolidate and rationalize their service areas to increase efficiency and provide better service to participants. We welcome all proposals from individual grantees or all the grantees in a state that result from these state meetings.

**Please note that any swap requests should be referenced in the reports but require a separate submission to the National Office. Because of the pending national grantee competition, no swaps are permitted until the national grantee awards are announced. The swaps will be effective when the national grantee transition is complete at the end of the calendar year. Instructions for requesting swaps will be provided when swap season is reopened.**

**State Grantees** (excluding the three territories and USVI) will submit two reports: the *Grantee ED Report* for their grant; and the *State ED Report*, with input from the national grantees that operate in the state. The state's Grantee Report is due October 12, 2020. The State Report will be due later this program year when the national grantees are settled in their territories and can engage in meaningful analysis of their ED status in each state in which they operate.

**National Grantees** will only submit *the Grantee ED Report* for their grant, and they must also assist the States in developing the *State ED Report* for the states in which they provide services.

### **State Equitable Distribution Report (ETA 8705A)**

State grantees should use the latest *Modified Tables by State* tab on [SCSEPED.org](http://SCSEPED.org) to determine the modified positions, enrollments, and variance by county and statewide for all grantees operating in their state that are subject to ED. State grantees should answer the questions on the *State ED Report* after consulting with all SCSEP grantees that provide services within the state.

State grantees will complete the *State ED Report* and explain the reasons for and the significance of any variance and the actions that the grantees have agreed to take collectively to improve ED.

### **Grantee Equitable Distribution Report (ETA 8705B)**

In addition to providing input to the state ED reports, each grantee, including the state grantees, will submit a *Grantee ED Report, ETA 8705B*. The state grantee reports should use the *Modified Positions by State* tables and the national grantee reports should use the *Modified Positions by Grantee* tables on [SCSEPED.org](http://SCSEPED.org) to determine the modified positions, enrollments, and variance by county and statewide for all areas served by the grantee.

Each grantee will complete the *Grantee ED Report* and explain the reasons for and the significance of any variance and the actions that the grantee will take to improve ED.

### **Potential Actions to Improve Equitable Distribution**

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

- Some grantees have consolidated their positions into a relatively small number of counties while others seek to have a presence in many or all counties, even when another grantee is serving those counties. DOL has encouraged grantees to engage in swaps that result in the consolidation of positions and the elimination of multiple grantees in the same county. Consolidation can help grantees provide services efficiently.
- Grantees can administer their grants through sub-recipients; DOL does not determine how county ED requirements are translated into sub-recipient service areas. However, if there are a large number of sub-recipients in a small service area, it might be hard for a sub-recipient to meet ED in all counties. DOL has encouraged grantees to consolidate sub-recipients to achieve greater economies of scale and potentially improve ED.

- DOL does not allow the transfer of grant funds from one grantee to another, nor will DOL allow transfers from one sub-grantee to another solely to address under- or over-enrollment that violates ED. Providing a larger service area to sub-grantees with a mix of large and small counties may facilitate the expenditure of grant funds; this approach may also minimize the reduction or increase of participant hours toward the end of the program year.

### **Submission Instructions for State and Grantee ED Reports**

State grantees should submit their Grantee ED report to [Grants.scsepdocs@dol.gov](mailto:Grants.scsepdocs@dol.gov), with a copy to their FPO, **no later than October 12<sup>th</sup>, 2020**. Be sure to attach the relevant modified position tables from [SCSEPED.org](http://SCSEPED.org) for the service areas corresponding to the report.

If you have questions about the ED reports, please direct them to your FPO and NOL.