

TECHNICAL ASSISTANCE

DWD Technical Assistance 2025-10: SCSEP Equitable Distribution

To: Indiana's Workforce System
From: Indiana Department of Workforce Development (DWD)
Date: 05/15/2026

PURPOSE

The purpose of this technical assistance is to clarify equitable distribution requirements under the Senior Community Service Employment Program (SCSEP). It explains the obligation of subgrantees assure eligible participants in the state have an equal chance of enrolling in the program and lays out expectations therein.

REFERENCES

- 20 CFR 641.140, 302, 360, and 365
- Section 507 of the Older Americans Act
- Senior Community Service Employment Program (SCSEP), Indiana State Plan, July 2024 – June 2027
- WorkforceGPS, *Equitable Distribution & the Senior Community Service Employment Program*¹
- WorkforceGPS, *SCSEP Grantee Orientation 2025*²
- DWD Policy 2025-08: *Senior Community Service Employment Program*
- DWD Policy 2019-04, Change 3: *Workforce Innovation and Opportunity Act (WIOA) Title I Adult Priority of Service*

DEFINITIONS

Authorized Positions³ 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 existing equitable distribution and Congressional appropriation.

SCSEP funding is based on the federal minimum wage, but grantees are obligated to pay any higher local minimum wage. **Modified Positions** were created by the Department of Labor (DOL) to account for differences between local minimum wages and the federal

¹ <https://www.workforcegps.org/events/2023/10/05/19/49/Equitable-Distribution-and-the-Senior-Community-Service-Employment-Program>.

² <https://olderworkers.workforcegps.org/resources/2025/01/27/21/58/SCSEP-Grantee-Orientation-2025>.

³ WorkforceGPS, *Equitable Distribution & the Senior Community Service Employment Program*.

minimum wage. Modified positions reflect the number of positions that can be actually supported.⁴

Equitable distribution report⁵ means a report based on the latest available Census or other reliable data, which lists the optimum number of participant positions in each designated area in the State, and the number of authorized participant positions each grantee serves in that area, taking into account the needs of underserved counties and incorporated cities as necessary. This report provides a basis for improving the distribution of SCSEP positions.

Training position⁶” refers to a **slot assigned to a participant** at a host agency for a community service assignment. It’s tied to both funding and participant eligibility and outlines grantee responsibilities for completing the annual Equitable Distribution Report.

Seat⁷ represents one authorized SCSEP position in the state’s allocation.

Seat swap⁸ refers to the movement of an “authorized position (seat)” from one service area and/or program provider to another. This is done to promote equitable distribution of SCSEP positions within the state during the program year.

CONTENT

Equitable Distribution (ED)⁹ is a statutory requirement that ensures that all SCSEP-eligible individuals within a state have an equal chance of enrolling into the program. Within each state, the distribution of authorized positions to the counties is determined by each county’s percentage of the SCSEP-eligible population in the state as determined by the Census. ED ensures that each county within the state is served, including rural and hard-to-serve areas.

Grantees are expected to monitor ED and enroll or stop enrolling participants in counties as necessary to comply with ED to the greatest extent possible. Grantees complete an annual report (Equitable Distribution Report) on the degree to which they have complied with ED in their service areas.¹⁰

Program Grantees

Suggested wording: Indiana is a SCSEP state grantee. There are also various National grantees operating within the state.¹¹

Each grantee has a specific number of authorized positions. Positions are adjusted each year by the Department of Labor based on the equitable distribution plan for each state and Congressional appropriation.

⁴ WorkforceGPS, *Equitable Distribution & the Senior Community Service Employment Program*.

⁵ 20 CFR 641.140.

⁶ As defined by DWD.

⁷ As defined by DWD.

⁸ As defined by DWD.

⁹ WorkforceGPS, *Equitable Distribution & the Senior Community Service Employment Program*.

¹⁰ NOTE: Participants can never be terminated based on ED.

¹¹ Indiana’s SCSEP State Plan, July 2024 – June 2027.

Program Participant Priority¹²

Priority enrollment must be given to individuals who have one or more of the following characteristics:¹³

- Are 65 years of age or older;
- Have a disability;
- Have limited English proficiency or low literacy skills;
- Reside in a rural area;¹⁴
- Are veterans (or, in some cases, spouses of veterans);
- Have low employment prospects;
- Have failed to find employment after using services provided through the one-stop delivery system;
- Are homeless or are at risk for homelessness; or
- Are formerly incarcerated individuals.

Indiana has a network of American Job Centers (WorkOne/AJCs)¹⁵ throughout the state. In addition to the SCSEP priorities listed above, SCSEP participants that interface with Indiana's WorkOne/AJC system may also be eligible for WIOA priority of service.¹⁶

Equitable Distribution Report¹⁷

The Equitable Distribution Report is a report based on the latest available Census or other reliable data, which lists the optimum number of participant positions (seats) in each designated area in the State, and the number of authorized participant positions (seats) each grantee serves in that area, taking into account the needs of underserved counties and incorporated cities as necessary. This report provides a basis for improving the distribution of SCSEP positions (seats).¹⁸

The equitable distribution report is prepared by State grantees at the beginning of each fiscal year and provides a "snapshot" of the actual distribution of all of the authorized positions (seats) within the State, grantee-by-grantee, and the optimum number of participant positions (seats) in each designated area based on the latest available Census or other reliable data.

Any distribution or redistribution of positions (seats) made as a result of a State Plan proposal will be reflected in the next equitable distribution report, which then forms the basis for the proposed distribution in the next State Plan update. This process is iterative, in that, it moves

¹² See DWD's *Senior Community Service Employment Program* policy for additional priority details.

¹³ 20 CFR 641.520(a).

¹⁴ DWD defines *more rural areas* as those where the population was in a county with greater than 40% of the population living in a rural area.

¹⁵ SCSEP is an American Job Center required partner.

¹⁶ See DWD's *Workforce Innovation and Opportunity Act (WIOA) Title I Adult Priority of Service* policy for additional information.

¹⁷ 20 CFR 641.360.

¹⁸ 20 CFR 641.140.

the authorized positions (seats) from overserved areas to underserved areas over a period of time.¹⁹

Negotiating and Executing Seat Swap Procedure

DWD utilizes the USDOL SCSEP data system [1] reports, the current Equitable Distribution Report, Indiana's SCSEP participant demographic information, and county economic conditions analysis to ensure that enrollment rates are aligned with the number of modified positions allocated.

DWD Subgrantee(s)

- Each month DWD will review the DWD SCSEP program counties and allowed seat allocations to determine if there is a variance in allowable seats versus placements of participants into the program in each county.
- In instances where participant enrollment is identified as under or over the allocated seat amount DWD will work with the subgrantee to identify how to address the over/under enrollment in that county.
- In accordance with SCSEP policy, the subgrantee is responsible for the development and execution of strategies to improve outreach and recruiting efforts for participants, host agencies, and potential employers in counties with enrollment variances.²⁰
- At the end of each quarter DWD SCSEP will review the equitable distribution data²¹ and any progress the subgrantee has made with adjusting over/under enrollments. This information will be used to establish discrepancies with equitable distribution and to determine if DWD needs to address the issue by requesting a seat swap.

National Grantee(s)

- Where there is an over/under enrollment of participants in counties served by DWD and another national SCSEP provider, DWD and its subgrantee will work with the national grantee(s) on addressing concerns of over/under enrollment to achieve equitable distribution.
- If all providers of SCSEP in a county identify consistent enrollment variances, DWD will work with the relevant National Grantee(s) to establish which counties, based on the equitable distribution reports, need to be adjusted to utilize program services to capacity. This report will be used to create a seat swap implementation plan between DWD and the National SCSEP Provider(s) to rebalance program participant enrollments to increase equitable distribution. In instances where coordination cannot be achieved at the grantee level, DWD will document these outreach efforts and seek guidance from the Federal Project Officer (FPO) for final resolution.

Minimizing Service Disruption

States must develop a strategy to minimize disruptions in service provision when there is a new Census or other reliable data indicating that there has been a shift in the location of the eligible population or when there is over-enrollment for any other reason.²²

¹⁹ 20 CFR 641.360.

²⁰ See DWD's *Senior Community Service Employment Program* policy for additional guidance.

²¹ Including monthly reports.

²² 20 CFR 641.365.

When a position (seat) must be moved, DWD develops a timeline encompassing major processes and milestones to ensure the ensure minimal disruption. The timeline is distributed to all impacted grantees. Example timeline content includes, but is not limited to, the following:

- Participant notification of provider change;
- Scheduling meetings with participants, their present grantee, and their potential new grantee; and
- Notifying host agencies of potential changes.²³

ADDITIONAL INFORMATION

Questions regarding the content of this publication should be directed to SCSEP@dwd.IN.gov.

²³ **NOTE:** It is essential that participants continue with their host agency and there is no disruption to their paychecks.