EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION SCSEP
	CORRESPONDENCE SYMBOL OWI-DNPTTA
	DATE May 24, 2019

ADVISORY: **TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 17-17, Change 1**

TO: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM GRANTEES

FROM: MOLLY E. CONWAY
Acting Assistant Secretary

SUBJECT: Change 1, Revised Program Year (PY) 2018 Planning Instructions and Allotments for Senior Community Service Employment Program (SCSEP) State, Territorial, and National Grantees

1. **Purpose.** This Training and Employment Guidance Letter (TEGL) provides SCSEP state, territorial, and national grantees with revised allocations, and the process and procedures for modifying their original PY 2018 grant submissions.

2. **Action Requested.** To adjust allocations for PY 2018 to include unexpended funds reserved for program integrity. SCSEP grantees must follow the instructions in this TEGL and submit all documents to grants.gov within 7 days of publication of this TEGL.

3. **Summary and Background.**

   a. **Summary.** The Employment and Training Administration (ETA) released TEGL 17-17 in 2018 to provide grant planning guidance to SCSEP grantees with the number of authorized positions and associated allotments for the program year and ETA's requirements for obligating funding to grantees pursuant to the Consolidated Appropriations Act, 2018, Public Law 115-141 (the Act), enacted March 23, 2018. The Act, Division H, Title I, sec. 106(b), allowed the Secretary to set aside up to 0.5 percent of each discretionary appropriation for activities related to program integrity.

   b. **Background.** SCSEP funds are allocated by a formula set forth in Sec. 506 of the Older Americans Act (OAA), and SCSEP operates on a program year basis from July 1 through June 30 of the following year. Section 106(b) and 107 of the Act allows the Secretary of Labor to set aside up to 0.5 percent of each discretionary appropriation for activities related to program integrity and 0.75 percent of most operating funds for evaluations. This Change 1 TEGL reflects the restoration of $1.2 million originally set aside for program integrity purposes to SCSEP state, territorial and national grantees.

RESCISSIONS TEGL 17-17	EXPIRATION DATE Continuing

Note: Acceptance of these funds will require a revised SF-424, SF-424A and budget narrative submission. Grantees will also be required to expend all PY 2018 funding no later than June 30, 2019. Grantees declining to accept these funds must do so in writing through their Federal Project Officer.

4. **Annual Grant Guidance.**

   a. **Program Allotments (Attachment I).** Attachment I details the adjusted funding amounts with the number of authorized positions for each grantee in PY 2018.
   b. **Grant Application Requirements.** Grantees must submit a revised SF-424, SF-424A and budget narrative within 7 days in order to receive the remaining amount of adjusted funds. ETA will not obligate funds to any grantee that fails to provide all of the information outlined in this guidance. Additionally, grantees accepting these funds must ensure that the components of the grant application package are consistent with each other.
      i. **Application and Budget Information Form.** Grantees must submit current versions of the SF-424 Application for Federal Assistance and the SF-424A Budget Information Form. Budgets must include the adjusted non-Federal share of at least 10 percent of the total cost (OAA Sec. 502(c)(1)). These interactive documents and accompanying instructions are available at: https://www.grants.gov/forms/sf-424-family.html.
      ii. **Budget Narrative.** Grantees must update their budget narrative to reflect the total revised funding amount. In particular, ensure that the modified budget narrative includes updated figures for:
         - Costs associated with each line item on the SF-424A Budget Information Form;
         - Both the percentage and total dollar amount allocated to participant wages and fringe benefits as described at 20 CFR 641.565; and
         - Both the percentage and total dollar amount allocated to administrative costs as described at 20 CFR 641.856.

5. **Notices of Award.** ETA will issue grant modifications to the existing grant number with the new allocation amounts to SCSEP grantees for PY 2018.

6. **Inquiries.** Please direct inquiries to the appropriate Regional Office.

7. **References.**

- Older Americans Act Reauthorization Act of 2016, Pub. L. 114-144 (April 19, 2016);
- Consolidated Appropriations Act, 2018, Pub. L. 115-141 (March 23, 2018);
- TEGL 17-17 *Program Year (PY) 2018 Planning Instructions and Allotments for Senior Community Service Employment Program (SCSEP) State, Territorial and National Grantees* (June 13, 2018);

- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule, 78 FR 78589 (December 26, 2013), published at 2 CFR Part 200; and
- TEGL 10-17, *2018 Federal Poverty Guidelines for Senior Community Service Employment Program (SCSEP)* Grants (March 19, 2018);
- Older Americans Act of 1965, as amended by the Older Americans Act Amendments of 2006 (OAA), Pub. L. 109-365, codified at 42 U.S.C. 3056 et seq;
- SCSEP Final Rule, 75 Federal Register (FR) 537864 (September 1, 2010), published at 20 CFR part 641;

8. <u>Attachments</u>.
Attachments IA-IE: Funding Allocations and Authorized Positions

USDOL/ETA

Senior Community Service Employment Program
PY 2018 Authorized Positions and Funding*
for State Agencies and Territories, by State (Total with PI Restored)

States	Positions	Dollars
State Agencies		
Alabama	152	$1,472,431
Alaska	175	1,699,458
Arizona	109	1,057,297
Arkansas	149	1,446,486
California	703	6,817,294
Colorado	83	804,324
Connecticut	90	869,189
Delaware	175	1,699,458
District of Col	47	460,540
Florida	484	4,689,727
Georgia	182	1,764,323
Hawaii	175	1,699,458
Idaho	44	423,111
Illinois	319	3,094,052
Indiana	215	2,082,162
Iowa	105	1,018,378
Kansas	84	810,810
Kentucky	156	1,511,351
Louisiana	138	1,342,702
Maine	51	492,973
Maryland	113	1,096,216
Massachusetts	179	1,731,891
Michigan	274	2,652,971
Minnesota	195	1,887,567
Mississippi	102	985,946
Missouri	203	1,965,404
Montana	52	499,459
Nebraska	63	609,729
Nevada	44	423,111
New Hampshire	44	423,111
New Jersey	231	2,244,323
New Mexico	46	447,567
New York	542	5,254,051
North Carolina	215	2,082,162
North Dakota	49	480,000
Ohio	358	3,470,269
Oklahoma	132	1,277,838
Oregon	120	1,167,567
Pennsylvania	439	4,255,133
Puerto Rico	112	1,089,729
Rhode Island	44	428,108
South Carolina	112	1,083,243
South Dakota	57	551,352
Tennessee	167	1,621,621
Texas	455	4,410,809
Utah	55	531,891
Vermont	45	441,081
Virginia	178	1,725,405
Washington	121	1,174,053
West Virginia	92	895,134
Wisconsin	210	2,036,756
Wyoming	44	423,111
State Agencies Total	**8,729**	**$84,622,132**
Territories		
American Samoa	93	898,875
Guam	93	898,875
Northern Marianas	31	299,625
Virgin Islands	93	898,875
Territories Total	**310**	**$2,996,250**

* Based on cost per position of $9,698, with enacted minimum wage increase effective 7/24/09

Senior Community Service Employment Program

PY 2018 Authorized Positions* for Non-Minority National Sponsors, by State (Total with PI Restored)

State	AARP	ABLE	ANPPM	ES	EW	GII	Mature	NAPCA	NCBA	NCOA	NOWCC	NULI	OPERABLE	SER	SSAI	TWP	A4TD	Total
Alabama	0	0	0	182	0	0	0	0	0	0	0	0	0	0	412	0	0	594
Alaska	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arizona	0	0	147	166	0	0	0	0	0	0	0	0	0	0	0	0	0	313
Arkansas	189	0	0	0	0	0	0	0	395	0	0	0	0	0	0	0	0	584
California	0	0	596	0	0	0	0	444	0	372	206	0	0	825	0	0	0	2,443
Colorado	146	0	0	0	0	0	0	0	0	0	0	0	0	178	0	0	0	324
Connecticut	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	352	0	352
Delaware	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District of Col	0	0	55	0	0	0	0	0	129	0	0	0	0	0	0	0	0	184
Florida	1,125	0	0	0	0	0	0	0	360	0	0	406	0	0	0	0	0	1,891
Georgia	215	0	0	0	0	0	0	0	0	495	0	0	0	0	0	0	0	710
Hawaii	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Idaho	0	0	0	0	154	0	0	0	0	0	0	0	0	0	0	0	0	154
Illinois	0	120	0	173	0	82	0	358	92	0	0	0	0	0	361	0	0	1,186
Indiana	200	63	0	0	0	386	0	0	0	0	0	0	0	0	190	0	0	839
Iowa	148	186	0	0	0	0	0	0	0	0	0	0	0	0	76	0	0	410
Kansas	0	0	0	0	0	0	0	0	0	0	0	0	0	316	0	0	0	316
Kentucky	0	0	0	0	0	269	0	0	0	218	0	120	0	0	0	0	0	607
Louisiana	0	0	490	0	0	0	0	0	0	0	0	0	0	0	0	0	0	490
Maine	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	198	198
Maryland	0	0	0	0	0	0	0	0	0	0	0	0	0	0	441	0	0	441
Massachusetts	0	0	0	0	0	0	0	0	0	0	0	0	346	0	310	0	0	656
Michigan	0	0	0	0	0	0	0	0	797	0	0	223	0	0	0	0	0	1,020
Minnesota	0	0	0	0	189	0	0	0	0	0	0	0	0	0	556	0	0	745
Mississippi	0	0	0	0	0	0	0	0	166	0	0	0	0	0	229	0	0	395
Missouri	261	0	0	0	0	170	0	0	224	0	0	0	0	116	0	0	0	771
Montana	0	0	0	0	200	0	0	0	0	0	0	0	0	0	0	0	0	200
Nebraska	0	237	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	237
Nevada	157	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	157
New Hampshire	0	0	0	0	0	0	0	0	0	0	0	0	154	0	0	0	0	154
New Jersey	0	0	0	298	0	0	0	0	0	383	0	225	0	0	0	0	0	906
New Mexico	0	0	0	0	0	154	0	0	0	0	0	0	0	0	0	0	0	154
New York	0	0	0	220	0	0	0	92	0	212	0	294	0	0	516	295	431	2,060
North Carolina	0	0	0	0	0	0	0	0	178	211	0	0	0	0	449	0	0	838
North Dakota	0	0	0	0	192	0	0	0	0	0	0	0	0	0	0	0	0	192
Ohio	255	0	0	133	0	250	469	0	142	148	0	0	0	0	0	0	0	1,397
Oklahoma	0	0	0	385	0	0	0	0	0	0	0	0	0	0	0	0	0	385
Oregon	0	0	0	471	0	0	0	0	0	0	0	0	0	0	0	0	0	471
Pennsylvania	338	0	121	0	0	0	0	0	0	549	0	156	0	0	0	349	167	1,680
Puerto Rico	167	0	0	0	0	0	0	0	0	274	0	0	0	0	0	0	0	441
Rhode Island	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	170	0	170
South Carolina	0	0	0	0	0	437	0	0	0	0	0	0	0	0	0	0	0	437
South Dakota	0	0	0	0	199	0	0	0	0	0	0	0	0	0	0	0	0	199
Tennessee	0	0	0	0	0	0	0	0	0	150	0	0	0	0	505	0	0	655
Texas	1,010	0	0	0	0	0	0	0	0	0	0	0	0	312	401	0	0	1,723
Utah	0	0	0	214	0	0	0	0	0	0	0	0	0	0	0	0	0	214
Vermont	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	175	175
Virginia	218	0	0	0	0	257	0	0	0	202	0	0	0	0	0	0	0	677
Washington	251	0	0	0	0	165	0	0	0	0	0	0	0	0	0	0	0	416
West Virginia	0	0	0	0	0	0	0	0	0	360	0	0	0	0	0	0	0	360
Wisconsin	0	0	0	0	0	0	0	0	0	0	0	0	0	564	231	0	0	795
Wyoming	0	0	0	0	154	0	0	0	0	0	0	0	0	0	0	0	0	154
Total	4,680	606	1,409	2,242	1,888	2,170	469	894	2,483	3,574	206	1,424	500	2,311	4,677	1,166	971	30,870

* Based on cost per position of $9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor / Employment & Training Administration

Attachment IC

Senior Community Service Employment Program

PY 2018 Authorized Funding* for Non-Minority National Sponsors, by State (Total with PI Restored)

State	AARP	ABLE	ANPPM	ES	EW	GII	Mature	NAPCA	NCBA	NCOA	NOWCC	NULI	OPERABLE	SER	SSAI	TWP	A4TD	Total
Alabama	$0	$0	$0	$1,765,381	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$1,994,326	$0	$0	55,759,707
Alaska	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arizona	0	0	1,423,897	1,608,553	0	0	0	0	0	0	0	0	0	0	0	0	0	3,032,450
Arkansas	1,833,245	0	0	0	0	0	0	0	3,829,060	0	0	0	0	0	0	0	0	5,662,305
California	0	0	5,778,892	0	0	0	0	4,305,046	0	3,606,978	1,997,967	0	0	7,999,290	0	0	0	23,688,173
Colorado	1,416,095	0	0	0	0	0	0	0	0	0	0	0	0	1,726,744	0	0	0	3,142,839
Connecticut	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3,415,564	0	3,415,564
Delaware	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District of Col	0	0	533,770	0	0	0	0	0	1,251,933	0	0	0	0	0	0	0	0	1,785,703
Florida	10,909,439	0	0	0	0	0	0	0	3,491,021	0	0	3,937,095	0	0	0	0	0	18,337,555
Georgia	2,086,278	0	0	0	0	0	0	0	0	4,803,292	0	0	0	0	0	0	0	6,889,570
Hawaii	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Idaho	0	0	0	0	1,496,943	0	0	0	0	0	0	0	0	0	0	0	0	1,496,943
Illinois	0	1,163,096	0	1,678,079	0	794,627	0	3,470,883	891,592	0	0	0	0	0	3,501,656	0	0	11,499,933
Indiana	1,940,617	611,294	0	0	0	3,742,332	0	0	0	0	0	0	0	0	1,842,073	0	0	8,136,316
Iowa	1,436,862	1,805,787	0	0	0	0	0	0	0	0	0	0	0	0	737,848	0	0	3,980,497
Kansas	0	0	0	0	0	0	0	0	0	0	0	0	0	3,064,917	0	0	0	3,064,917
Kentucky	0	0	0	0	0	2,609,753	0	0	0	2,115,795	0	1,164,028	0	0	0	0	0	5,889,576
Louisiana	0	0	4,753,219	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,753,219
Maine	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,915,573	1,915,573
Maryland	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,272,702	0	0	4,272,702
Massachusetts	0	0	0	0	0	0	0	0	0	0	0	0	3,356,410	0	3,007,189	0	0	6,363,599
Michigan	0	0	0	0	0	0	0	0	7,727,424	0	0	2,162,128	0	0	0	0	0	9,889,552
Minnesota	0	0	0	0	1,833,698	0	0	0	0	0	0	0	0	0	5,387,039	0	0	7,220,737
Mississippi	0	0	0	0	0	0	0	0	1,610,052	0	0	0	0	0	2,221,095	0	0	3,831,147
Missouri	2,529,519	0	0	0	0	1,647,316	0	0	2,173,338	0	0	0	0	1,123,810	0	0	0	7,473,983
Montana	0	0	0	0	1,935,053	0	0	0	0	0	0	0	0	0	0	0	0	1,935,053
Nebraska	0	2,298,688	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,298,688
Nevada	1,525,965	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,525,965
New Hampshire	0	0	0	0	0	0	0	0	0	0	0	0	1,496,943	0	0	0	0	1,496,943
New Jersey	0	0	0	2,889,555	0	0	0	0	0	3,713,591	0	2,182,517	0	0	0	0	0	8,785,663
New Mexico	0	0	0	0	0	1,496,943	0	0	0	0	0	0	0	0	0	0	0	1,496,943
New York	0	0	0	2,133,829	0	0	0	892,329	0	2,056,236	0	2,851,572	0	0	5,004,800	2,861,271	4,180,366	19,980,403
North Carolina	0	0	0	0	0	0	0	0	1,726,860	2,047,008	0	0	0	0	4,355,955	0	0	8,129,823
North Dakota	0	0	0	0	1,863,625	0	0	0	0	0	0	0	0	0	0	0	0	1,863,625
Ohio	2,473,677	0	0	1,290,192	0	2,425,173	4,549,625	0	1,377,499	1,435,703	0	0	0	0	0	0	0	13,551,869
Oklahoma	0	0	0	3,733,745	0	0	0	0	0	0	0	0	0	0	0	0	0	3,733,745
Oregon	0	0	0	4,571,402	0	0	0	0	0	0	0	0	0	0	0	0	0	4,571,402
Pennsylvania	3,277,818	0	1,173,420	0	0	0	0	0	0	5,324,030	0	1,512,839	0	0	0	3,384,492	1,619,514	16,292,113
Puerto Rico	1,618,007	0	0	0	0	0	0	0	0	2,654,695	0	0	0	0	0	0	0	4,272,702
Rhode Island	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,649,341	0	1,649,341
South Carolina	0	0	0	0	0	4,233,741	0	0	0	0	0	0	0	0	0	0	0	4,233,741
South Dakota	0	0	0	0	1,928,560	0	0	0	0	0	0	0	0	0	0	0	0	1,928,560
Tennessee	0	0	0	0	0	0	0	0	0	1,454,339	0	0	0	0	4,896,274	0	0	6,350,613
Texas	9,797,638	0	0	0	0	0	0	0	0	0	0	0	0	3,026,597	3,889,953	0	0	16,714,188
Utah	0	0	0	2,071,417	0	0	0	0	0	0	0	0	0	0	0	0	0	2,071,417
Vermont	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,701,288	1,701,288
Virginia	2,113,955	0	0	0	0	2,492,140	0	0	0	1,958,802	0	0	0	0	0	0	0	6,564,897
Washington	2,433,037	0	0	0	0	1,599,407	0	0	0	0	0	0	0	0	0	0	0	4,032,444
West Virginia	0	0	0	0	0	0	0	0	0	3,493,486	0	0	0	0	0	0	0	3,493,486
Wisconsin	0	0	0	0	0	0	0	0	0	0	0	0	0	5,472,744	2,241,496	0	0	7,714,240
Wyoming	0	0	0	0	1,496,943	0	0	0	0	0	0	0	0	0	0	0	0	1,496,943
Total	45,392,152	5,878,865	13,663,198	21,742,153	10,554,822	21,041,432	4,549,625	8,668,258	24,078,779	34,663,955	1,997,967	13,810,179	4,853,353	22,414,102	45,352,406	11,310,668	9,416,741	299,388,655

* Based on cost per position of $9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor / Employment & Training Administration

Senior Community Service Employment Program

PY 2018 Authorized Positions* for Minority National Sponsors, by State (Total with PI Restored)

State	IID	NAPCA	NICOA	Total
Alabama	0	0	0	0
Alaska	0	0	0	0
Arizona	0	0	117	117
Arkansas	46	0	0	46
California	0	207	34	241
Colorado	0	0	0	0
Connecticut	0	0	0	0
Delaware	0	0	0	0
District of Col	0	0	0	0
Florida	0	0	0	0
Georgia	0	0	0	0
Hawaii	0	0	0	0
Idaho	0	0	0	0
Illinois	0	62	0	62
Indiana	0	0	0	0
Iowa	0	0	0	0
Kansas	0	0	0	0
Kentucky	0	0	0	0
Louisiana	91	0	0	91
Maine	0	0	0	0
Maryland	0	0	0	0
Massachusetts	0	74	0	74
Michigan	0	0	0	0
Minnesota	0	0	19	19
Mississippi	37	0	0	37
Missouri	0	0	0	0
Montana	0	0	0	0
Nebraska	0	0	0	0
Nevada	0	0	0	0
New Hampshire	0	0	0	0
New Jersey	0	0	0	0
New Mexico	0	0	37	37
New York	0	57	0	57
North Carolina	0	0	0	0
North Dakota	0	0	14	14
Ohio	0	0	0	0
Oklahoma	0	0	89	89
Oregon	0	0	0	0
Pennsylvania	0	53	0	53
Puerto Rico	0	0	0	0
Rhode Island	0	0	0	0
South Carolina	0	0	0	0
South Dakota	0	0	31	31
Tennessee	0	0	0	0
Texas	32	55	0	87
Utah	0	0	0	0
Vermont	0	0	0	0
Virginia	0	0	0	0
Washington	0	56	0	56
West Virginia	0	0	0	0
Wisconsin	0	0	17	17
Wyoming	0	0	0	0
Total	206	564	358	1,128

* Based on cost per position of $9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor / Employment & Training Administration

Senior Community Service Employment Program

PY 2018 Authorized Funding* for Minority National Sponsors, by State (Total with PI Restored)

State	IID	NAPCA	NICOA	Total
Alabama	$0	$0	$0	$0
Alaska	0	0	0	0
Arizona	0	0	1,135,041	1,135,041
Arkansas	446,256	0	0	446,256
California	0	2,008,150	329,841	2,337,991
Colorado	0	0	0	0
Connecticut	0	0	0	0
Delaware	0	0	0	0
District of Col	0	0	0	0
Florida	0	0	0	0
Georgia	0	0	0	0
Hawaii	0	0	0	0
Idaho	0	0	0	0
Illinois	0	601,475	0	601,475
Indiana	0	0	0	0
Iowa	0	0	0	0
Kansas	0	0	0	0
Kentucky	0	0	0	0
Louisiana	882,810	0	0	882,810
Maine	0	0	0	0
Maryland	0	0	0	0
Massachusetts	0	717,889	0	717,889
Michigan	0	0	0	0
Minnesota	0	0	184,323	184,323
Mississippi	358,945	0	0	358,945
Missouri	0	0	0	0
Montana	0	0	0	0
Nebraska	0	0	0	0
Nevada	0	0	0	0
New Hampshire	0	0	0	0
New Jersey	0	0	0	0
New Mexico	0	0	358,945	358,945
New York	0	552,969	0	552,969
North Carolina	0	0	0	0
North Dakota	0	0	135,817	135,817
Ohio	0	0	0	0
Oklahoma	0	0	863,407	863,407
Oregon	0	0	0	0
Pennsylvania	0	514,164	0	514,164
Puerto Rico	0	0	0	0
Rhode Island	0	0	0	0
South Carolina	0	0	0	0
South Dakota	0	0	300,737	300,737
Tennessee	0	0	0	0
Texas	310,439	533,566	0	844,005
Utah	0	0	0	0
Vermont	0	0	0	0
Virginia	0	0	0	0
Washington	0	543,268	0	543,268
West Virginia	0	0	0	0
Wisconsin	0	0	164,921	164,921
Wyoming	0	0	0	0
Total	1,998,450	5,471,481	3,473,032	10,942,963

* Based on cost per position of $9,698, with enacted minimum wage increase effective 7/24/09