

GPMS DATA COLLECTION HANDBOOK MODULE III APPENDIX:
Exit, Placement, Right of Return, Follow-Up, Add Service, and Add Organization,
Version 1.0

Introduction

Each module of the GPMS Data Collection Handbook has an appendix containing discussions of topics that are relevant to the headings and data fields within the module. The order and numbering of the topics in the appendix follow those of the main text of the module. These topics provide more extended discussion of important issues for the GPMS data collection and reporting system and provide context for the individual data fields described in the main text.

Topics generally address broad concepts, such as: what “exit” means, what types of income are includable or excludable, when follow-ups must be completed, and what services may be provided before assigning an applicant to community service. The topics also include relevant information from the SCSEP regulations, TEGs, and other guidance.

Each appendix has a version number and a date on the bottom of each page. The hard copy version of the appendix that users may have been given may not contain the most up-to-date version of the topics. However, the version on the CoP will always be the most recent, and users are encouraged to check that site regularly. Additions and clarifications to the appendix may also be posted on the CoP as they occur. In addition to the Table of Contents, the PDF versions of the modules and appendices have a search function that allows users to search for key words. The search function will bring you to each instance of the search terms in the appendix. This is probably the easiest and quickest way to find topics.

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I. EXIT

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1. Category of Exit, field 1.2

1.a *Entered employment discovered after exit*

- The performance system will count any entered employment, i.e., any employment within the second quarter after the exit quarter, regardless of whether the placement occurred at the time of exit or subsequent to exit. If you discover the placement after the participant exited, you should complete the placement screen, Section II and conduct the follow-ups as appropriate, Section IV.
- You do not change the original exit reason and exit date as entered on fields 1.1 and 1.3. The system will detect the placement from the placement screen.
- It may be worthwhile to stay in touch with some participants (especially those who are most job-ready) who exit the program for personal reasons to determine whether their circumstances have changed. They may have obtained employment on their own, or they may be interested in your assistance in finding employment. If no employment has begun by the last day of the first second after the exit quarter, there is little reason to continue following these participants for performance measurement purposes. They count as not having achieved Q2 Employment and will not be subject to the Median Earnings measure. They will still be counted for Q4 Employment, so if resources commit, you might want to contact them at that time.

1.b *Work-study as employment*

- DOL has stated that work study counts as unsubsidized employment. This is because work study is taxable and is considered employment for eligibility purposes (unless it is part of an employment and training program; see Section II, Topic 2.o in the Appendix for Module I) and because it is treated as employment for programs that use UI wage matching.

1.c *Programs funded by Corporation for National and Community Service*

- Participation in the Foster Grandparent Program (FGP), the Senior Companion Program (SCP), the Senior Demonstration Programs (SDP), and the Retired and Senior Volunteer Program (RSVP) is not considered employment. These programs are all funded by the Senior Corps of the Corporation for National and Community Services. The Domestic Volunteer Service Act establishes these programs and VISTA as volunteer service, not employment, and further provides that the stipend paid to participants in these programs should not be considered income from employment. Therefore, you do not consider participants in these programs to be employed, you do not include any stipend paid by these programs when determining income for purposes of SCSEP eligibility, and you do not treat them as unsubsidized employment.

1.d *Temporary/on-call employment and the employment outcome measures*

- Q2 employment does not consider the type or duration of employment. Any employment whatsoever, including temporary or on-call employment for as little as an hour during the second quarter after the exit quarter, suffices to establish Q2 employment.

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1.e *OJE's and Q2 employment*

- OJE is a type of training. Because it is subsidized in part by the program, it does not qualify as unsubsidized employment even if the employer directly pays the participant's wages during the OJE. Furthermore, a participant must remain enrolled in the program during an OJE; the participant does not exit and is not included in the employment outcome measures until the OJE ends and the employer has hired the participant. The start work date in field 3.1 should be the first day on the employer's payroll after the OJE has ended and the participant has exited from the program.

1.f *Employment status of participants who do not start community service*

- You can fill out the placement and follow-up screens for an exited participant who never started work at his or her host agency assignment and receive credit. However, since you are only supposed to enroll those who need and can benefit from community service, the number of cases where someone obtains a job before starting a community service assignment should be extremely limited. An applicant who got a job so quickly after enrolling was probably job-ready. Although you will receive credit for Q2 employment, a monitor could find that the enrollment was improper.
- Job-ready applicants should be referred to the American Job Center. If your MOU so provides, you may conduct job search and placement activity for job-ready applicants. However, You should determine them ineligible and indicate in fields 11.3 and 11.4 on the eligibility page in Module I the action you took to assist them.

2. Other reason for exit, field 1.6

2.a *Exit for durational limit*

- A participant who has reached the individual durational limit must be exited on the exact date on which the limit is reached. This is the date that is listed on the Waiver of Durational Limit (WDL) report. You may not allow the participant to remain enrolled beyond the durational limit date. You must give the participant 30 days' written notice before exit and must inform the participant of his or her rights under the grantee's grievance policy. It is always good practice to have the participant sign an acknowledgment of the notice and of the right to file a grievance.
- The record will be locked for participants who have exceeded their durational limit date (DLD) but have not gotten an extension or have not been exited within 7 days of the DLD. Grantees must request that DOL unlock the record by sending a completed form to [SCSEP Help](#). If the record is unlocked and an exit is entered, the grantee will then be able to enter any additional information into the record, including a subsequent unsubsidized employment.
- Durational exits are not exclusions from the core performance measures. They are involuntary exits for other reasons and are listed in field 1.6. As with any exit, the Placement screen, not the Exit screen, determines whether the participant will be credited with entered employment. Participants who exit for durational reasons, like participants who exit for personal reasons, will be counted as positive for entered employment if there is Placement record in the GPMS where field 5.2 (FU 1, employment in the quarter after the exit quarter) is marked "yes."

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2.b *Correcting errors in exit for durational limit*

- DOL has consistently said that if a grantee improperly exits a participant for any reason, not just durational limit, it must offer the participant reinstatement. DOL has not set a time limit on how long after the exit the reinstatement can occur. The grantee error could be as simple as a mistake in data entry or the failure to enter a waiver factor; or the error could be due to a misapplication of the grantee's own policy or of SCSEP program rules. However, if the reason for the exit was the participant's failure to document the existence of a waiver factor after proper notice, that is not a basis for reinstating the participant after the durational limit has passed.
- The reinstatement of a wrongfully exited participant involves the removal of the original exit reason and exit date and usually requires the creation of an approved break in participation for the time during which the participant was wrongfully out of the program. Such action requires notice to the FPO and the national office and documentation in a case note.
- Note that grantees are required to give participants adequate notice of an approaching durational limit and are expected to assist participants in obtaining documentation for waiver factors as needed. A grantee may also grant the participant an approved break in participation if the durational limit is close and there is a reasonable likelihood that documentation will be forthcoming. The approved break stops the durational limit clock.

2.c *Non-exit reasons for closing the record*

- You do not use any of the fields on the exit screen when the applicant or participant has left your project but has not truly exited SCSEP, or when you are resolving a dual enrollment.
- Once the participant has been assigned to community service, you must use field 1.6 to exit the participant. Use Related Actions or the Activity dropdown in Cases to record that an applicant has withdrawn from the waiting list or has withdrawn their applications after being determined eligible but before being assigned to community service.
- When a participant is transferred to another grantee, the GPMS will close the donor's current assignment and change the participant's status to Exited-Closed. In a future release, the system will create an editable new assignment on the recipient record with a start date equal to the transfer effective date.
- When a participant has been moved to another sub grantee within the same grantee, the entire participant records is moved from the donor sub-grantee to the recipient sub-grantee. Thus, the donor sub-grantee no longer has a record that can be closed. The system will reduce the donor's count of active participants but will not increase the count of exits. The recipient sub-grantee's count of active participants will be increased, but there will not be an increase in the count of new enrollments.

2.d *Removing applicants from the waiting list for administrative reasons*

- Applicants on the waiting list are not participants and thus cannot have true exits. However, there are fields in Related Actions and the Activity dropdown in Cases to record that an applicant has withdrawn from the waiting list or has withdrawn their application after being determined eligible but before being assigned to community service. That will allow you to close your record when someone withdraws an application or withdraws from the waiting list.

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These are the only fields you can use in these circumstances. You should enter the date on which you formally removed the applicant from the waiting list. That will generally be the date of data entry unless you have documented an earlier date on the hard copy Exit Form or elsewhere.

- Unless you have a written policy governing removal from the waiting list, removing someone for administrative reasons may be problematic. An applicant has an absolute right to apply to the program. The rules require you to place on the waiting list any eligible applicant who is not assigned to a host agency within two weeks of being determined eligible. Therefore, an applicant you remove from the list would presumably be able to insist on filing a new application and being put back on the waiting list. (See Topic 2.e below, Responsibility to Applicants on Waiting List.) You should enter a case note in the comments field of the Exit Form explaining the reason for removing the applicant from the waiting list, especially if the administrative reason involves fault on the part of the applicant, e.g., falsifying the eligibility information.
- You should generally provide 30 days' written notice before removing someone from the waiting list on your own initiative. Obviously, no notice is required when the applicant informs you that he or she is no longer interested in the program.

2.e Responsibility to applicants on waiting list

- An applicant is entitled to remain on the waiting list as long as he or she is still interested in an assignment and meets the eligibility requirements. However, it is not fair to the applicant or helpful to the program to let applicants languish on the waiting list for an excessive period. You should generally be in touch with waiting list applicants every three months to find out if they are still interested in the program and are still eligible, and to give them an update on when they might be enrolled. If there is no reasonable prospect of an opening, the participant might decide to withdraw or explore some other program. The choice remains with the applicant. No matter how unlikely the prospect of enrollment, you cannot force someone off the waiting list.
- The confirmation of the eligibility of applicants on the waiting list should be done informally and for the benefit of the applicant. An eligibility determination is good for 12 months, barring a substantial change in circumstance. Furthermore, an applicant who is over-income at some point while on the waiting list may not be over-income when an opening is available. However, if an applicant has become over-income and is approaching 12 months since the eligibility determination, an applicant is entitled to know that any assignment would be short-lived, and that the first recertification would result in termination from the program. Given that information, the applicant might decide to withdraw from the waiting list.
- Although you are normally not required to redo or update the eligibility of the participant, you should update the rest of the intake screens, especially the barriers to employment because you will need that information for making an appropriate assignment and because the priorities of service must reflect the participant's situation at the time of enrollment.
- If there has been a change in any of the characteristics that are subject to data validation, you will need appropriate documentation. Since the intake screens are filled out by the case worker, you should not need the participant to initial or sign anything. If you do want the participant to update any forms you use, you can have the participant re-date and re-sign the

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forms and initial any changes from the original as long as a validator or monitor can easily tell what has occurred. If there is any ambiguity, it is better to complete a second form and keep both forms in the file.

2.f *Exiting participants who have gone missing or fail to return from a leave of absence*

- For AWOL participants, you should use the second exit reason in field 1.6, “For Cause. Participants have an obligation to keep in touch with you. Their failure to do so justifies your terminating them in accordance with your termination policy. Depending on the reason for the participant's failure to return and whether the participant complied with your notification requirement, you may also use the for cause value to record the participant's exceeding the maximum duration of a leave of absence or otherwise violating your leave policy.

2.g *Can participants work part-time hours while transitioning to employment?*

- Participants may not work any hours at all in unsubsidized employment (except for occasional and casual employment, such as babysitting a neighbor's child) while they are enrolled in the program. You may, however, use an OJE to structure a transition to unsubsidized employment. See the topics on OJEs in Section V of the appendix to Module II.

2.h *Exiting participants who start employment while enrolled*

- The rules regarding employment of participants are clear: No participant may begin a job while enrolled in SCSEP. A participant who does so must be exited for unsubsidized employment. Grantees' rules and procedures, including their termination policy, should explicitly spell out this eligibility requirement, and all participants should be informed in writing at the time of enrollment. Grantees should also ensure that all host agency agreements include a provision that requires the host agency to acknowledge this requirement and to inform the grantee of any violations.
- When you are informed that a participant has commenced, or is about to commence, unsubsidized employment, you should follow your normal procedures to exit the participant. Normally, the last day in the program would be the day before unsubsidized employment commences. If you learn of the employment after it has commenced, you must immediately begin the process of exiting the participant. This entails issuing the 30-day notice of termination that is required for all involuntary exits and placing the participant on approved break for administrative reasons during the 30-day notice period.
- You complete the placement screen for the participant regardless of how or when you learned of the employment. The start work date (field 3.1 on the placement screen) must be after the date of exit from the program. (By definition, unsubsidized employment for purposes of SCSEP placement can only exist after the participant has left the program.) If you learn of the employment after it has begun, the start work date must be the day after exit, not the actual date on which the participant began the employment.

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3. Termination letter, field 1.9

3.a *Notice of termination for misconduct; removal from host agency*

- The regulations require that you must always provide written notice of the reason for an involuntary termination. You must give the participant 30 days' notice and an opportunity to respond before you terminate. All terminations are subject to the grantee's grievance procedure.
- Although a termination for misconduct cannot be effective for 30 days after you provide the termination notice, in some cases, grantees may need to remove a participant from a host agency immediately upon becoming aware of an alleged violation. However, there is a difference between an alleged violation and an established violation. Grantees may be justified in temporarily removing a participant from a host agency pending their investigation and the determination of whether misconduct has, in fact, occurred. Depending on the circumstances, grantees might assign the participant to the project office or have the participant stay home pending the determination. In any case, a participant is entitled to notice and an opportunity to be heard before the participant is deprived of the benefits of the program. Therefore, no participant may be terminated from SCSEP (as opposed to being removed from a host agency) until after the 30-day notice has expired.

3.b *Termination for falsification of application; eligibility information vs. other material information*

- The consequences of falsifying an application depend on the information that was falsified. If the falsification relates to information required for the eligibility determination, the grantee must terminate the participant (after a 30-day notice) if the information was knowingly falsified. The "knowing" requirements means both that the participant knew the information was false and knew that the information was relevant to the eligibility determination. It essentially means that the applicant intentionally gave you false information in order to be determined eligible.
- Note that this regulatory requirement pertains only to information required for the eligibility determination. Ex-offender status is not a permitted factor for eligibility, and grantees may not deny eligibility on that basis. If a grantee wants to terminate a participant for having falsified non-eligibility information, like ex-offender status, on the application, it may only do so pursuant to an approved grantee termination policy that makes intentional falsification of material information a terminable offense. Grantees are permitted to have their own termination policies that are: 1) in compliance with the regulations, 2) approved by DOL, and 3) reasonable.
- Since ex-offender status is often a barrier to employment that may affect the IEP and the ability to assign the participant, it can be a material factor that grantees are entitled to inquire about. Whether termination is appropriate for falsification of this information depends on the particular facts of the case, including the language of the termination policy, how the policy was communicated to the participant, and whether the participant understood the consequences. The grantee must make that determination. Like all terminations, a 30-day notice must be given prior to termination, and any adverse actions must be subject to the grantee's grievance policy. Remember, however, that discrimination based on ex-offender status is not permitted; grantees should carefully determine the materiality of the information before deciding to terminate.

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3.c *Exit for durational limit; effect of approved break*

- All involuntary exits, including those for durational limit, must have a 30-day termination letter. If the durational limit date is extended by an approved break after the termination letter has been issued, you should send a revised notice of termination extending the termination date to the new DLD. Because of their effect on duration, approved breaks during the 30-day notice period should be extremely rare.

II. PLACEMENT

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1. Self-Employed, field 3.4

1.a *Determining whether the participant is self-employed or an employee*

- There is no simple way to determine whether a former participant is truly self-employed or is being forced to work as an independent contractor by an entity that should be considered the participant's employer. It is a question of state law whether former participants are employees or independent contractors (self-employed). In most states, participants are considered employees unless they hold themselves out to the public as being engaged in their occupation and are free from direction and control in the performance of their duties. For unskilled, unlicensed work, this is a very hard standard to meet.
- If you believe that the participant is being forced to work under the table and is being deprived of rights under state or federal law, e.g., to Social Security, unemployment compensation, workers' compensation, you should inform the participant that the arrangement may be illegal, that the participant is entitled to all of the protections of state and federal employment laws, and that you can assist the participant in filing a complaint with the appropriate authorities. You should also inform the participant that you are required to contact the employer to confirm the employment and to obtain wage information. Your involvement may be sufficient to persuade the employer to comply with the law. Any retaliation against the participant by the employer would expose the employer to serious liability. On the other hand, if the participant is fully aware of his or her rights and is comfortable with being paid as an independent contractor, you may not wish to interfere.
- For SCSEP purposes, there is not a significant difference in the way you treat an individual who is self-employed versus an individual working as an employee for an employer. For self-employed participants, you will do all three follow-ups. See Section IV. Topic 1.g below for follow-up on self-employed participants.
- Self-employment should not be confused with temporary or on-call employment, such as substitute teaching or working for a temporary employment agency. The distinction can be especially difficult when dealing with home aides, who may be either self-employed when they are caring for private clients directly or employed by an agency when placed in a client's home. Again, state labor law officials are your best resource for making this determination.

2. Employer Search, fields 3.8-3.10

2.a *Rule against entering duplicate organizations into GPMS database*

- The GPMS will not permit users to enter an organization into the database if that identical organization already exists. Organizations are considered identical if they have the same name and they are in the same city and state. GPMS users will be blocked from entering a duplicate organization into the database.
- As with host agencies, there are circumstances where using the name of the parent employer organization will not be feasible. In those cases, you may enter multiple

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organizations with similar but not identical names in the same state. For example, Walmart LA North, Walmart LA Central, and Walmart LA East are considered unique organizations even though they are all in the same city in the state of California.

- If you attempt to enter an organization that already exists in the database, you will be asked whether you want to use the existing organization. If you do not wish to use an existing organization, you will be required to change the name of the organization to one that is unique.

2.b *Using stored host agency information when a host agency becomes an employer*

- GPMS users can designate an existing host agency as an employer without having to re-enter basic organization information. After selecting an existing organization from Add Organization function in the Admin Console, the user can designate the existing organization in any additional capacity. For example, an existing host agency can also be designated as a training provider and an employer.
- When you give an existing organization a new capacity, you will only have to add the fields that are specific to the new capacity. For an employer, an additional field is 12.1.

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1. Follow-up Details, field 5

1.b *Documenting follow-up information*

- When you conduct the three required follow-ups, it is important that you document the information you receive regarding employment and wage information. This documentation is required for data validation.
- If you rely on documents, you should copy the documents for the file. If you use the phone or an in-person interview, you should use the comment fields to record the individual spoken to, the date, the information conveyed, and the case worker who obtained the information. For example, “Follow-up 2: Spoke to bookkeeper Roger Johnson by phone on 1/25/19. He reported that participant was still employed and received wages of \$5850 in the quarter October 1 - December 31. BP”
- For self-employment, you should also copy and file any documents that you used to determine that the participant was engaged in a legitimate business and the evidence that supports your calculation of net earnings.

1.c *Follow-up information, how to obtain from employer*

- The follow-up information is best obtained from the employer. Participants may not work consistent hours and may not keep accurate records of their pay for the quarter. You must make reasonable efforts to obtain the information from the employer before you seek it from the participant. The participant is not required to sign the waiver of confidentiality on the Exit page. However, even if the participant does not sign the waiver or does not want you to contact the employer, you are still required to try to obtain the information from the employer.
- Although some participants may be reluctant to have their employers know about their participation in SCSEP, it is important that employers become aware of the program. Doing the follow-up activity with the employer is an opportunity for you to establish a relationship with the employer that may lead to additional placements. You should attempt to assure participants that their involvement with SCSEP will be seen as a positive factor by employers and will not in any way jeopardize their employment. You should discuss this issue at orientation so participants understand how important employer contact is to the program and are not surprised at exit to discover that you will be contacting their employers.

1.d *Follow-up information, inability to obtain*

- All exiters (with a few limited exceptions) are included in the performance measures. If the sub-grantee does not record the required employment or wage information into the SCSEP data collection system by the specified deadlines, the absence of data is treated as though the exiter had no employment or wages. Q2 employment, median earnings, or Q4 employment could be affected, depending on which information is missing.
- DOL recognizes that some employers may be reluctant to provide the required information. For that reason, it has recommended that the sub-grantee obtain a waiver of confidentiality from the participant at the time of exit and that the sub-grantee conduct the first follow-up in person. This first follow-up will provide an opportunity for the sub-grantee to establish a

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relationship with the employer and to explain the importance of the follow-up information before the sub-grantee has to ask the employer for wage information. If the employer is unwilling to provide the information, the sub-grantee may obtain it from the participant. There may be cases where the participant can no longer be located, but these should be fairly uncommon.

- Missing or incomplete follow-up information, regardless of the reason for the incompleteness, will have a negative effect on the performance measures.

1.e *Follow-ups for participants working under the table and unwilling to reveal their employers*

- If the participant refuses to provide any information about the employer, you will not receive any credit at all in the performance measures.
- If the participant is working under the table, you should inform the participant that the arrangement is illegal, that the participant is entitled to all of the protections of state and federal wage and hours laws, and that you can assist the participant in filing a complaint with the appropriate authorities. You should also inform the participant that you are required to contact the employer to confirm the employment and to obtain wage information. Your involvement should be sufficient to persuade the employer to comply with the law. Any retaliation against the participant by the employer would expose the employer to serious liability.
- If the participant identifies the employer and is employed during the second quarter after the exit quarter, the placement will count toward Q2 employment regardless of how the employer pays the participant. Workers are sometimes compelled to accept illegal working conditions. Neither you nor the participant should be penalized for the employer's actions.

1.f *UI wage records.* DOL has said that all grantees must use case management follow-up for the three employment outcome measures until UI wage records are made available for SCSEP nationwide. Wage records yield significantly different results from case management follow-up. In addition, because of the lag in reporting UI wage records, the timing rule for wage records is very different from that used for case management follow-up. SCSEP grantees cannot have different data sources and methodologies for a statutory measure that is common to all grantees. DOL is working to make wage records available for all grantees.

1.g *Follow-ups, scheduled dates for completing*

- The timing rules for the employment outcome measures follow-ups are simplified in the GPMS. Each measure has an activity period (the quarter in which the outcome being measured occurs), a data collection or follow-up period (the quarter during which the follow-up can first be conducted), and a reporting period (the quarter in which the measure will be reflected in the QPR). The earliest date on which a follow-up can be conducted and the last date on which the follow-up data can be entered are listed immediately above the fields for entering the date of each follow-up; these dates differ for each measure. The official QPR will not reflect either successes or failures for a measure until after the first day after the WIPS reporting period closes, but the internal GPMS QPR (unlike the SPARQ QPR) will show follow-up progress in real time.

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- Follow-up 1 captures Q2 employment. Both the activity period and the reporting period are the second quarter after the exit quarter. The scheduled date is the first day of the second quarter after the exit quarter. Although you can complete the follow-up during this quarter and enter the data into the GPMS, the measure will not be reported in the internal QPR for the second quarter after the exit quarter until the end of the activity period, in this case, the first day of the third quarter after the quarter of exit. The official QPR will not report this information until two quarters later.
- Follow-up 2 captures median earnings. Because you need complete earnings in the second quarter after the exit quarter, you must wait until the second quarter ends in order to collect the complete earnings. As a result, the activity period is the second quarter after the exit quarter, and the reporting period is the third quarter after the exit quarter. Thus, you may complete Follow-up 2 at any time during the third quarter after the exit quarter, but the results will not be reported in the internal QPR until the first day of the fourth quarter after the exit quarter. The official QPR will report median earnings at the same time it reports Q2 employment. You must record median earnings for all participants for whom you reported Q2 employment. Failure to record at least \$1 of earnings in Follow-up 2 will ultimately result in loss of credit for Q2 employment.
- Follow-up 3 captures the measure for Q4 employment. Like Q2 employment, both the activity period and the reporting period are the same, the fourth quarter after the exit quarter. Although you can complete the follow-up during this quarter and enter the data into GPMS, the measure will not be reported in the internal QPR for the fourth quarter after the exit quarter until the end of the activity period, in this case, the first day of the fifth quarter after the quarter of exit. Again, the official QPR reporting will lag by two quarters.
- Each follow-up must be completed in the program year in which the reporting quarter falls. For Follow-up 1, follow-ups for all exits in the first two quarters of the program year must be completed by approximately 90 days after the official close of the program year. For exits occurring during the third and fourth quarter of the program year, the reporting period is the subsequent program year, so you have until approximately the following September 30 to complete Follow-up 1.
- For Follow-up 2, all exits in the first quarter of the program year must be completed by September 30 following the close of the program year; all exits in the second-fourth quarters of the program year have their reporting period in the following program year, so you have until approximately 90 days after the following program year closes.
- For Follow-up 3, all exits occurring in any quarter of the program year have their reporting period in the following program year, so you have approximately 90 days after the close of that following program year to complete this follow-up.

1.h *Follow-ups for self-employed participants*

- Self-employment is counted for all three employment outcome measures: Q2 employment, median earnings, and Q4 employment. That requires you to do all three follow-ups.
- For self-employment, you must document that the participant is engaged in a legitimate business, and you must also information about income or earnings. Self-employment may be verified by any proof that the individual is engaged in a business, such as tax registration,

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business cards or invoices, or a state license. You can use the self-attestation form on the Data Validation Handbook to collect gross income and business expenses in order to calculate net income for field 5.5.

- If you reported in Follow-up 1 that a self-employed participant had Q2 employment, you must do Follow-up 2 in order to obtain net income from self-employment. If you fail to do so, you will ultimately lose the credit that you received for Q2 Employment and the record will be counted as a negative outcome.

1.i *Follow-ups only for exited participants who have employment and no exclusion*

- You need to fill out the placement and follow-up fields for each employer that a participant has during the follow-up period, generally the first 15 months after exit. If you know that the participant has failed to achieve a measure with an employer, you can indicate "no" in the appropriate field along with the date of the follow-up. If you do not complete the fields for a follow-up, the measure will be treated as a failure.
- If a participant is excluded at the time of exit, you should not do any follow-up with that participant even if the participant subsequently becomes employed.
- The GPMS uses the right of return, Section VI below, and the date any re-enrollment to determine whether there is a countable exit for the employment outcome measures. If the participant exercises the right of return or re-enrolls within 90 days of the date of exit, the outcome measures do not apply. Therefore, you would not need to do any follow-ups.

1.j *"Orphan exiters": follow-up for participants who exited before a sub-grantee has gone out of business*

- Whenever a total change of sub-grantee occurs, there may be exited participants who are still in the follow-up period, typically 15 months after the date of exit. Since these "orphan exiters" are not active participants, the question arises as to which entity will handle their follow-up if the old sub-grantee goes out of business.
- You cannot transfer participants who exited from a closing sub-grantee. Once an exit has occurred for any reason, you can no longer enter a transfer into the database.
- You can, however, use the batch change of entity function in the GPMS to have the new sub-grantee that is receiving all the active participants from the closing sub-grantee take responsibility for the orphan exiters as well. The easiest way for this to occur is for the receiving sub-grantee to receive the entire database of the closing sub-grantee. At that time, the database of the closing sub-grantee would be marked as "retired" in the GPMS.
- If more than one sub-grantee is receiving the active participants from the sub-grantee that is closing, you can still use the change of entity function to assign the orphan exiters to one or more of these recipient sub-grantees.
- Alternatively, the grantee itself may perform the follow-up activities for the orphan exiters. The grantee has read/write access to the databases of all of its sub-grantees. It could perform the follow-up and update the records of only the orphan exiters while assigning the active participants to one or more sub-grantees. The entire database for the old sub-grantee would be marked as "retired" in SPARQ when the outcomes for the orphan exiters were final.

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- If the grantee lets the sub-grantee go out of business and does not make arrangements for some other entity to do the follow-up for the orphan exiters, the grantee will lose any remaining outcome credit for exited participants. The national office strongly discourages this option because it will negatively affect performance at the grantee and nationwide levels.

1.k *Follow-up for participants who re-enroll after having had a placement*

- How re-enrollment affects follow-up and grantee credit for employment outcomes depends on when the re-enrollment occurs. Re-enrollment (or right of return) that occurs within 90 days of exit means that there is no true exit for the employment outcome measures. Therefore, there is no possibility of outcome credit in the GPMS and no need to do any follow-up. On the other hand, if the individual re-enrolls more than 90 days after exit (there can be no right of return after 90 days), the exit counts, and the grantee from which the participant exited will be credited for all relevant outcome measures. That grantee should continue doing follow-up until it is clear that further employment credit is no longer possible. (In a future release, an edit in the GPMS will alert you if the participant has re-enrolled with another grantee.)
- How much follow-up the original grantee does will be determined by when the re-enrollment occurs. If the re-enrollment does not occur until more than 6 months after exit, the grantee should have already done Follow-up 1 and gotten credit for Q2 employment. In that case, the participant will also be in the pool for median earnings, which requires employment in the second quarter after the exit quarter. Re-enrollment before 6 months of employment means that the original grantee will not be able to complete Follow-up 1 and that Q2 employment will not be achieved.

1.l *Follow-ups for participants with multiple employers*

- There is no requirement that the participant remain employed with the same employer throughout the follow-up period. Follow-up 1 cannot be positive unless there are some wages reported for follow-up 2; however, if there is a successful follow-up 1, follow-up 2 includes all wages from any and all placements during the second quarter after the exit quarter, even if the first placement ended during the second quarter. Follow-up 3 is not dependent on employment in any quarter other than the fourth quarter after the exit quarter so you should conduct that follow-up even if follow-ups 1 and 2 are negative.
- You must fill out the placement fields for each job that a participant has during the follow-up period, generally the first 15 months after exit. No matter how many jobs the participant has, either concurrently or consecutively, you will only get credit for one Q2 employment and one Q4 employment per enrollment. In the GPMS, you can enter "no" many times for these measures, but you should only enter one "yes," even if the participant has multiple employers.
- When there are multiple employers, start the follow-up with the current employer. If that employer can provide definitive information about all the measures that you are trying to capture in that follow-up, you do not have to contact previous employers. If the current employer cannot give you a definitive answer, then you contact the next most recent employer and keep moving back in time until you have gotten a definitive answer or have run out of employers. Do not delete a placement just because it was unsuccessful and the participant started a new job.

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- A separation from an employer followed by a return to work with the same employer can be a layoff and recall. If so, you do not enter a second placement into the GPMS. All of the follow-up occurs on the original placement, and all employment outcome measures credit is tied to that placement.
- If the circumstances of the separation from and subsequent return to employment with the employer are such that categorizing them as a layoff and recall is not feasible, you can enter a second placement with the same employer into the GPMS after entering an end date for the first placement. Since you can only get credit for one Q2 employment and one Q4 employment following a single exit from SCSEP, which placement you do the follow-up with will be determined by the timing of the two placements. Assuming that the participant achieved Q2 employment in the first placement but left the employment in the second quarter after the exit quarter, you would record Q2 employment with the follow-up record for the first placement but might have to enter median earnings for the second quarter after the exit quarter in the record for both the first and the second placement. If, after achieving Q2 employment, the participant left employment in the third quarter after the exit quarter and resumed employment in the fourth quarter after the exit quarter, you would have to record the fourth quarter's employment in the follow-up record for the second placement. The fact that the two placements are with the same employer would be irrelevant.
- In the GPMS, you only need to fill in the follow-up information that is required for each employer. You can leave the other fields blank and ignore the missing data messages you get, or you can enter "no" and avoid the missing data messages. The QPRs treat blank fields as "no" once the time for doing the follow-up has passed.
- The case manager receives a Task & Notification when a follow-up is due. The management report for follow-ups also indicates which grantees have pending, overdue, or expired follow-ups. In a future release, overdue follow-ups that can be completed before the end of the program year reporting period (during the so-called 5th quarter) will be escalated to the sub-grantee administrator.

1.m *Using pay stubs for earnings information*

- DOL requires grantees to attempt to obtain earnings information for median earnings from the employer because that is the only way to ensure the accuracy of the data. See Topic X.X above. If repeated efforts to obtain the information from the employer are unsuccessful, the grantee may obtain the information from the participant. However, if it does so, the grantee must use paystubs for all wages it enters for median earnings; it cannot multiple one pay stub by 13 or let the participant estimate the total amount of the wages.
- When using paystubs, the first and last payments may be for payroll periods that span the quarter. Grantees should count the checks when they were paid, as opposed to the pay periods they are for. This ensures consistency among the grantees and prevents a situation where each grantee makes up its own method of calculating what portion of the paycheck should be allocated to Q2.

1.n *Earnings when working on commission* For Follow-up 2 purposes, you will need to determine the actual earnings, including commission, from the employer. That should not be a problem since the employer is required to keep a record of all earnings, including

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commissions. However, for starting wage per hour in field 3.20, there is no way to tell what commissions the participant may eventually earn. All you can safely do for this field is leave it blank.

IV. SERVICES

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1.a *Supportive services during unsubsidized employment*

- The regulation states that grantees may provide necessary supportive services during the first 12 months following placement. This authorizes grantees to arrange for or pay for supportive services after exit for employed participants, including those in self-employment.
- Paid training is not part of the follow-up services that may be provided to exited participants who are in unsubsidized employment. Permissible supportive services during the 12-month follow-up period include help with transportation, uniforms or other work-related expenses, eyeglasses, and medical care. See the first bullet in Section VI, page 19, of Module III.
- The regulation gives examples of what may constitute supportive services, but it does not specifically address the kinds of supportive services that someone in self-employment might need. The intent and spirit of the regulation would cover many types of incidental expenses but would not reasonably extend to the purchase of significant equipment or supplies needed to start a business.
- Because SCSEP funds are so limited, the regulation states that, “to the extent practicable,” grantees should arrange for the payment of supportive service from sources other than SCSEP.

V. ADD EMPLOYER

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1. FEIN, field 6.2

1.a FEIN. FEINs are for the use of grantees and are not mandatory. In addition to Google, there are numerous online search services for FEINs. Despite FEINs being discoverable online, some companies consider their FEIN to be proprietary. This is more likely to be true of employers than host agencies.

- For more information, see <http://www.irs.gov/businesses/small/article/0,,id=98350,00.html>