



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF CAREER, TECHNICAL, AND ADULT EDUCATION

PROGRAM MEMORANDUM OCTAE 17-6

DATE: June 1, 2017

TO: State Directors of Adult Education

FROM: Kim R. Ford /s/
Deputy Assistant Secretary,
Delegated the Duties of the Assistant Secretary

RE: Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act

Purpose

The purpose of this memorandum is to provide sub-regulatory guidance on the requirements established by the Workforce Innovation and Opportunity Act (WIOA) and its implementing regulations regarding the use of supplemental wage information, when appropriate, to assist in carrying out the performance accountability requirements under section 116 of WIOA.

Background

Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for the individuals served by each of the six core WIOA programs. The core programs are: the Adult, Dislocated Worker, and Youth programs authorized under WIOA title I and administered by the U.S. Department of Labor (DOL); the Adult Education and Family Literacy Act (AEFLA) program authorized under WIOA title II and administered by the U.S. Department of Education (ED); the Employment Service (ES) program authorized under the Wagner-Peyser Act, as amended by WIOA title III and administered by DOL; and the Vocational Rehabilitation (VR) program authorized under title I of the Rehabilitation Act of 1973, as amended by WIOA title IV and administered by ED.

www.ed.gov

400 MARYLAND AVE., SW, WASHINGTON, DC 20202

Our mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

On August 19, 2016, DOL and ED (the Departments) published in the Federal Register the WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions (Joint WIOA Final Rule) at 81 FR 55791, which took effect on October 18, 2016. On December 19, 2016, the Departments released *Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs*¹ to further clarify the requirements of the performance accountability system and assist States in understanding the methodologies for calculating levels of performance for the six primary indicators of performance, the operational parameters for each of the indicators, and the application of each of the indicators to each core program.

This guidance provides clarification to States on the use of supplemental wage information (described in detail on page 6 in the section titled “Supplemental Wage Information Methods and Procedures”), when reliance on such information is necessary for verifying and reporting on the employment-related performance indicators: employment rate during the second quarter after exit from the program; employment rate during the fourth quarter after exit from the program; and median earnings during the second quarter after exit from the program.² The guidance also applies to the employment-related portion of the credential attainment indicator.³

Primary Indicators of Performance

Under section 116(b)(2)(A) of WIOA, the performance accountability indicators that apply across the six core programs are:

1. Employment Rate – Second Quarter After Exit: The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program (for title I Youth, the indicator is the percentage of participants in education or training activities, or in unsubsidized employment during the second quarter after exit).

¹ See *Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs*, joint guidance issued on December 19, 2016 via the [Office of Career, Technical, and Adult Education \(OCTAE\) Program Memorandum 17-2](#), [DOL Employment and Training Administration Training and Employment Guidance Letter \(TEGL\) 10-16](#), and [Rehabilitation Services Administration \(RSA\) Technical Assistance Circular \(TAC\) 17-1](#).

² Further details on the methodology and operational parameters for each of the employment-related indicators may be found in OCTAE Program Memorandum 17-2; DOL TEGL 10-16; and RSA TAC 17-1.

³ 20 CFR 677.155 (a)(1)(iv)(B), 34 CFR 463.155(a)(1)(iv)(B), and 34 CFR 361.155(a)(1)(iv)(B). See also OCTAE Program Memorandum 17-2; DOL TEGL 10-16; and RSA TAC 17-1. As noted in the section below titled “Primary Indicators of Performance,” a participant who obtains a secondary school diploma or its recognized equivalent must meet an additional condition before they are counted as a successful outcome and included in the numerator of the credential attainment indicator. The participant is included in the calculation “...only if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.” Therefore, for the credential attainment indicator, States may elect to use supplemental wage information to collect information on employment within one year after exit.

2. Employment Rate – Fourth Quarter After Exit: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program (for title I Youth, the indicator is the percentage of participants in education or training activities, or in unsubsidized employment during the fourth quarter after exit).
3. Median Earnings – Second Quarter After Exit: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.
4. Credential Attainment: The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.
5. Measurable Skill Gains: The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.
6. Effectiveness in Serving Employers: WIOA sec. 116(b)(2)(A)(i)(VI) requires the Departments to establish a primary indicator of performance for effectiveness in serving employers. The Departments are piloting three approaches designed to gauge how well the workforce system is meeting critical workforce needs of the business community.

Availability of Social Security Numbers (SSNs) and Wage Records to Collect Employment Information

Section 116(i)(2) of WIOA requires States to use quarterly wage records, consistent with State law, to measure their progress on satisfying State and local performance accountability indicators. The Joint WIOA Final Rule implements these requirements in 20 CFR 677.175, 34 CFR 463.175, and 34 CFR 361.175 by requiring States to use, consistent with State law, quarterly wage record information such as intrastate and interstate wages paid to an individual, an individual's SSN, and the Federal employer identification number of the employer paying the wages to the individual.

However, the Departments recognize that in particular circumstances (further described below) there are challenges the core programs face in tracking the progress of individuals for whom obtaining a quarterly wage record match may not be possible. In order to ensure that programs may track the participants for performance accountability purposes even if their information is not contained in the State’s quarterly wage record system, the Joint WIOA Final Rule permits States to use “other information as is necessary to measure the progress of those participants through methods other than quarterly wage record information” if quarterly wage records are not available for a participant (20 CFR 677.175(a)(3), 34 CFR 463.175(a)(3), and 34 CFR 361.175(a)(3)).

Matching a participant’s SSN against quarterly wage record information is the most effective means for determining employment status and earnings for a program participant. However, a quarterly wage record match will not be possible in all circumstances. Eligibility to participate in any of the programs under WIOA is not contingent upon the individual providing an SSN.⁴ More broadly, since the performance indicators require reporting on *all* participants,⁵ States are encouraged to develop a method for quantifying the performance outcomes of participants who do not provide SSNs or for whom wage records are not available in order to include them in the calculation of levels of performance for each of the core programs.

Circumstances for Collecting Employment-Related Data Using Supplemental Methods for Performance Reporting Purposes

For purposes of the employment-related performance indicators, a participant’s status in unsubsidized employment and quarterly earnings may be determined by a variety of data sources. To the extent it is consistent with State law, direct Unemployment Insurance (UI) wage match, obtained through either State UI data or the out-of-State wage record data exchange, via appropriate agreement,⁶ will be the primary data source for verifying participant outcomes for

⁴ See 81 FR at 55838.

⁵ Although the definition of “participant” is consistent across the core programs, there are some slight differences to account for programmatic requirements. For the WIOA title I Adult, title I Dislocated Worker, title II AEFLA, and title III Wagner-Peyser Act ES programs, a participant is a reportable individual who has received services other than the services described in 20 CFR 677.150(a)(3), 34 CFR 463.150(a)(3), and 34 CFR 361.150(a)(3), after satisfying all applicable programmatic requirements for the provision of services, such as eligibility determination. For the title I Youth program, a participant is a reportable individual who has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy, and received one or more of the 14 WIOA Youth program elements identified in sec. 129(c)(2) of WIOA. For the VR program, a participant is a reportable individual who has applied and been determined eligible for VR services, has an approved and signed Individualized Plan for Employment, and has begun to receive services. See 20 CFR 677.150(a); 34 CFR 463.150(a); 34 CFR 361.150(a); and OCTAE Program Memorandum 17-2; DOL TEGL 10-16; and RSA TAC 17-1 issued December 19, 2016.

⁶ The Wage Record Interchange System (WRIS) is a data sharing agreement used to exchange wage record information for performance reporting purposes between States that are party to the data sharing agreement. WRIS,

purposes of calculating levels of performance for the employment-related indicators and will be used when available. UI wage records include private sector and government employer wage reports, such as:

- State government employment records;
- Local government employment records;
- Judicial employment records; and
- Public school employment records.

While most forms of employment in a State's workforce will be reported via employer tax filings in the UI wage records system as noted above, certain types of employers and employees are excluded from coverage under Federal and State UI laws. For program participants engaged in these types of employment, and for participants for whom the State does not have an SSN on record, States may use supplemental wage information and wage data from other reliable sources to collect employment-related data necessary for calculating levels of performance.

Individuals for whom a quarterly wage record match would not be available through the State UI data system include but are not limited to:

- Federal employees;
- Military employees; or
- Individuals who are self-employed.

States that are not signatories to the Wage Record Interchange System (WRIS) cannot access State UI wage records through the WRIS. Furthermore, performance reporting for the AEFLA and VR programs is not a permissible query of the WRIS, and the WRIS cannot be used to obtain UI wage records to carry out performance reporting for the AEFLA and VR programs. However, performance reporting for the AEFLA and VR programs will be a permissible query of the State Wage Interchange System (SWIS). That is, the SWIS can be used to obtain UI wage records to carry out performance reporting for the AEFLA and VR programs. As has been true with the WRIS, States that are not signatories to the SWIS will not be able to access State UI

and WRIS2, were established under the Workforce Investment Act of 1998 (WIA); the successor system under WIOA will be known as the State Wage Interchange System (SWIS). Section 116(i)(2) of WIOA continues the requirement that States use wage records to assess performance and the Secretary of Labor's authority to facilitate the exchange of wage data across States. Additionally, section 116 of WIOA identifies core programs administered by the Departments and their performance accountability responsibilities, which include the use of UI wage records for performance accountability purposes. As of the date of this guidance, the Departments are working with States to establish the new SWIS Data Sharing Agreement that builds on the established protocols, permissions, and protections under the WRIS and WRIS2 and will help to facilitate States' compliance with WIOA's performance reporting requirements.

wage records through the SWIS.

Sources of supplemental wage information for the types of employees described above include:

- Federal employment records, such as military employment records, or records from the U.S. Department of Defense, U.S. Postal Service, and U.S. Office of Personnel Management;
- State New Hires Registry;
- State Department of Revenue or Taxation;
- Railroad Retirement System; and
- Other forms of supplemental wage information (see description in the next section).

It is important for States to consider the following when deciding to voluntarily collect supplemental information for purposes of calculating levels of performance for the employment-related indicators:

1. States are required to report a participant's status in unsubsidized employment during the second quarter and fourth quarter after exit. In addition, a participant's quarterly earnings may only be reported for calculation of median earnings during the second quarter after exit, upon direct wage record match or collection of supplemental wage information. While median earnings are not reported for the fourth quarter after exit, either a direct wage record match or supplemental wage information is required to determine a participant's employment status in the fourth quarter after exit.
2. Within each quarter after exit for which wages are required pursuant to the performance accountability indicators, if a direct wage match is used to determine both employment status and wages for the period, then the same direct wage match record must be used for both wages and employment status. Likewise, if supplemental wage information is used to determine both employment status and wages within the same reporting period, then the same supplemental wage information must be used for both wages and employment status. There is no requirement that the same direct wage record match or supplemental wage information be used across multiple reporting periods, particularly in the event that the individual's employment status changes making the employment and wage verification method initially used not practicable or ideal. The Departments recommend that States use direct wage record matches whenever possible because such method yields the most reliable data.
3. When calculating levels of performance, States that elect not to use supplemental wage information are still expected to include participants who do not have the necessary data to complete a wage record match in the denominator. In so doing, those individuals would be counted as negatives (0 in the numerator) when

calculating levels of performance for the second and fourth quarter employment status indicators. Participants will be excluded from the median earnings indicator calculation if the employment rate second quarter after exit is a negative (0).

4. For States that elect to use supplemental wage information, States must ensure that a participant's quarterly earnings used for reporting the median earnings indicator (second quarter after exit) only reflect those wages that are actually paid to the participant during the quarter.

Supplemental Wage Information Methods and Procedures

For States that determine the need to collect supplemental wage information for the employment-related indicators, acceptable forms of supplemental wage information, relevant to the core program, include, but are not limited to, the following:

Tax documents, payroll records, and employer records such as:

- Copies of quarterly tax payment forms to the Internal Revenue Service, such as a Form 941 (Employer's Quarterly Tax Return);
- Copies of pay stubs (minimum of two pay stubs); or
- Signed letter or other information from employer on company letterhead attesting to an individual's employment status and earnings.

Other supplemental wage records:

- Follow-up survey (self-reported) from program participants;
- Income earned from commission in sales or other similar positions;
- Detailed case notes verified by employer and signed by the counselor, if appropriate to the program;
- Automated database systems or data matching with other partners with whom data sharing agreements exist;
- One-Stop operating systems' administrative records, such as current records of eligibility for programs with income-based eligibility (e.g., Temporary Assistance for Needy Families (TANF) or Supplemental Nutrition Assistance Program (SNAP)); or
- Self-employment worksheets signed and attested to by program participants.⁷

The Departments recommend the following procedures when a State determines the need to collect supplemental wage information:

⁷ Earnings (or net profit) can be calculated by subtracting total expenses from gross receipts. Not all self-employed individuals receive a salary, but the funds that represent income over expenses that are available to be invested back into the business are considered earnings.

A. Time Period for Collecting Supplemental Wage Information

As described above, for purposes of calculating levels of performance for the employment rate indicators, States must collect data on participants' employment status during the second and fourth quarters after the participant exits the program⁸ and, for purposes of calculating levels of performance for the median earnings indicator, States must collect data on participants' wages during the second quarter after exit from the program. Follow-up to collect supplemental wage information may be conducted by the State, local programs, or a third-party contractor. The timing for collecting supplemental wage information may vary based on whether the agency knows or expects that UI wage data will not be available for a participant following the exit from a program.

The need for supplemental wage information for some individuals may not become apparent until no match is found in direct UI wage records, or in federal or military employment records, which become available on a time-lagged basis. UI wage data for the employment rate and the median earnings indicators during the second quarter will not become available until the latter part of the third quarter after exit, and UI wage data for the education or employment rate during the fourth quarter after exit will not become available until the latter part of the fifth quarter after exit.

However, when the agency knows or predicts that UI wage data will not be available for individuals (such as those participants who did not provide an SSN, or for participants not covered by UI wage data, such as those who received entrepreneurial or self-employment training), States do not need to wait two quarters after the close of the second and fourth full quarters after exit to formally document that UI wage data are not available and begin collection of supplemental wage information. The optimal time to collect supplemental wage information is as soon as possible following the close of the second and fourth full quarters after exit. In general, the Departments recommend the programs remind participants, before program exit, that they or their employers may be contacted to obtain confirmation of employment status and earnings, and to explain the expected timeframe for those follow-up contacts. While this reminder is applicable to all participants, it is especially important for those participants for whom UI wage data are not available.

⁸ For the purpose of the employment portion of the credential rate indicator, States must collect data on participants' employment status each quarter after exit within one year after exiting the program. (See Table 1: Timeline for Commencing Data Collection for Employment-Related Performance Indicators).

Table 1, below, summarizes the times when data match or supplemental wage data are to be collected.

Table 1: Timeline for Commencing Data Collection for Employment-Related Performance Indicators		
Performance Indicator^a	UI Wage Data Becomes Available	Collection of Supplemental Wage Information May Begin^b
Employment Rate – Second Quarter after Exit (including Title I Youth)	During third or fourth quarter after exit	Beginning third quarter after exit
Employment Rate – Fourth Quarter after Exit (including Title I Youth)	During fifth or sixth quarter after exit (first or second quarter, next program year)	Beginning fifth quarter after exit
Median Earnings – Second Quarter after Exit	During third or fourth quarter after exit	Beginning third quarter after exit
Credential Attainment – within 1 Year after Exit	During second or third quarter after exit	Beginning second quarter after exit

^a For all performance indicators, exit is the point after which a participant who has received services through any program meets the criteria for exit from that program, or meets the criteria for exit under an applicable common exit policy (20 CFR 677.150(c), 34 CFR 463.150(c), and 34 CFR 361.150(c)).

^b For individuals for whom the agency knows or predicts UI wage data will not be available (such as those participants who do not provide an SSN, or for participants receiving entrepreneurial or self-employment training), States should begin collecting supplemental wage information as close to the reference period as possible.

Participants who provide an SSN and have exited a program, but for whom information is not yet available, are not included in performance calculations until such data subsequently become available. The Departments expect that UI employer tax record data for these indicators will generally be available, since there is a two-quarter lag built into the reporting periods to allow time for reporting participant exit and direct UI wage record match, and for obtaining supplemental wage information if a direct UI wage record match, or Federal or military employment record, is not yet available.⁹ In order to ensure data are available and reported

⁹ After the two-quarter lag concludes, if the information is still not available, wages will be converted to \$0 permanently and employment status will be reported as not employed. Wages reported as \$0 will indicate that the participant was unemployed in the second quarter after exit, counting as a negative outcome for purposes of

consistently for all participants, UI data should be reported four quarters after exit for second quarter wage and employment information, and six quarters after exit for fourth quarter information. This allows for a one-quarter lag in the reporting of UI wages by employers and an additional one-quarter lag for reporting by the core programs.

Example: If a participant exits the program between July 1, 2016 and September 30, 2016 (first quarter of program year (PY) 2016), the participant will not be included in the Employment Rate – Second Quarter After Exit until the quarterly report for the quarter ending September 30, 2017 (first quarter of PY 2017) and the annual report for PY 2017 for the period ending June 30, 2018.

Quarterly data reporting is required for all core programs except for the AEFLA program (i.e., the Adult, Dislocated Worker, Youth, Wagner-Peyser Act ES, and VR programs) (20 CFR 677.235(a), 34 CFR 463.235(a), and 34 CFR 361.235(a)). States must report AEFLA data on an annual basis, but are required to collect data on a quarterly basis. To ensure data are collected to satisfy required reporting timelines, particularly for those programs reporting on a quarterly basis, States may decide to conduct supplemental wage information follow-up more frequently than quarterly, as more frequent follow-up may be more convenient or cost efficient. For example, the program could conduct continuous, ongoing, or monthly follow-up activities. Therefore, the Departments recommend that programs ensure the time lag to contact participants after they exit the program be as short as possible to ensure follow-up activities are successful. The longer a program waits to contact participants after they exit the program, the greater likelihood of a lower response rate which could result in less valid data.

The timeframes when employment-related information must be reported are shown in **Table 2** below:

calculating levels of performance for the Employment Rate Second Quarter after Exit indicator and excluding that participant from the calculations of levels of performance for the Median Earnings Second Quarter after Exit indicator. Likewise, if neither a wage record match nor supplemental wage information is available following a two-quarter lag after the end of the fourth quarter following program exit, the participant will be reported as unemployed in the fourth quarter after exit.

Table 2: Deadlines for Timely Collection of Data for Employment-Related Performance

Exit Quarter	Report Employment Rate – 2nd Quarter (including Title I Youth) by End of:	Report Employment Rate – 4th Quarter (including Title I Youth) by End of:	Report Median Earnings by End of:	Report Credential Attainment (Employment) – within 1 Year after Exit by End of:
First Quarter (Q1) <i>(July 1 – September 30)</i>	Q1, Next Program Year (four quarters later)	Q3, Next Program Year (six quarters later)	Q1, Next Program Year (four quarters later)	Q3, Next Program Year (six quarters later)
Second Quarter (Q2) <i>(October 1 – December 31)</i>	Q2, Next Program Year (four quarters later)	Q4, Next Program Year (six quarters later)	Q2, Next Program Year (four quarters later)	Q4, Next Program Year (six quarters later)
Third Quarter (Q3) <i>(January 1 – March 31)</i>	Q3, Next Program Year (four quarters later)	Q1, Second Program Year After Exit (six quarters later)	Q3, Next Program Year (four quarters later)	Q1, Second Program Year After Exit (six quarters later)
Fourth Quarter (Q4) <i>(April 1 – June 30)</i>	Q4, Next Program Year (four quarters later)	Q2, Second Program Year After Exit (six quarters later)	Q4, Next Program Year (four quarters later)	Q2, Second Program Year After Exit (six quarters later)

B. Method for Identifying Participants Needing Follow-Up for Wage Information Collection Purposes

In order to effectively identify individuals with whom the agency will need to follow up to collect supplemental wage information, the State’s or local area’s case management database needs to be capable of identifying participants who should be followed using supplemental methods, i.e., all participants for whom direct UI wage record match, Federal, or military employment records are not or were not yet available for data matching. Programs must also determine the appropriate information to collect from participants to assist in, and during, follow-up, such as: (1) participants’ SSN (if available) and contact information; and (2)

supplemental wage information related to all of the employment-related performance indicators. This information needs to be retrievable quarterly or according to the time when States determine supplemental wage information follow-up is to be implemented.

If a program uses supplemental wage information follow-up to retrieve data on any of the employment-related performance indicators, data must be collected on all of these indicators, or missing and incomplete data points will be counted as a negative when calculating levels of performance for the indicator(s).

C. Staff Training on Supplemental Wage Information Follow-Up Methods

When conducting supplemental wage information follow-up, the Departments recommend that staff follow a uniform set of written procedures to collect data in a valid and reliable manner. Therefore, staff conducting the supplemental wage information follow-up should be trained in the implementation of the follow-up procedures, including what to say to former participants or their employers to encourage their cooperation, ways to encourage voluntary and truthful disclosure, how to document the information received, and how to respond to questions related to the supplemental wage information follow-up process. Staff should be thoroughly familiar with all procedures before beginning the process.

The Departments recognize that programs and States may consider supplemental wage information to be a very difficult aspect of data collection, particularly since it is sometimes difficult to follow up in a way that produces valid and reliable results (e.g., conducting follow-up surveys or other forms of self-reporting). The process includes determining which individuals should be included in the supplemental wage information follow-up; locating the individual, employer or case manager; securing his/her cooperation; and conducting the follow-up procedure. Maintaining contact with, or finding, these former participants and getting them to cooperate in the supplemental wage information follow-up process is critical to its success since the response rate largely determines the validity of the information. Locating such individuals can be difficult, given the transient nature of some core program participants. The procedures described below will assist States in collecting valid supplemental wage information in a timely manner.

The validity of the follow-up process depends largely on the acceptable forms of supplemental wage information received from participants. To help improve this aspect of the follow-up process, it is very important that participants know how they may be contacted later and asked about their employment outcomes. Therefore, programs should inform participants at program entry about the supplemental wage information follow-up process and collect extensive contact information about them, such as addresses and phone numbers of relatives or others who may know the participants' whereabouts over time and employment information, if applicable. In addition, participants should be encouraged to provide new addresses and phone numbers when they move, and programs should implement procedures to update this information periodically

while the participant remains enrolled in the program. These procedures can greatly assist in locating former participants months later when the supplemental wage information may need to be collected. States should provide local programs with additional guidance to improve the level of response.

Summary of Supplemental Wage Information Follow-Up Guidelines

1. Develop a method for identifying participants to contact for follow-up.

Best practice tip: Have staff follow a uniform set of written procedures to collect data in a valid and reliable (i.e., accurate and repeatable) manner.

2. Ensure that the State has a uniform way to conduct the follow-up.

3. Conduct the follow-up as close to the reference period as possible.

4. Train staff to conduct the follow-up.

5. Identify local resources available to conduct the follow-up.

6. Implement procedures to improve the quantity and quality of participant responses.

Best practice tip: Inform participants at program entry about the supplemental wage information follow-up process and collect extensive contact information about them, such as addresses and phone numbers of relatives or others who may know the participants' whereabouts over time and employment information, if applicable.

7. Ensure that the State has a database and procedures for supplemental wage information reporting.

Action Requested

States are requested to distribute this information to the appropriate State and local staff.

Inquiries

Questions and comments from DOL-funded grantees may be directed to the appropriate ETA Regional Office and Federal Project Officer. Questions and comments from ED-funded grantees may be directed to the appropriate RSA State Liaison or OCTAE Area Coordinator.

Attachment

Additional Considerations when Using Supplemental Wage Information for the Core Programs

Attachment
Additional Considerations when Using Supplemental Wage
Information for the Core Programs

When collecting supplemental wage information for the core programs, the Departments recommend that States consider the following:

1. The varying intervals of pay schedules mean that not every quarter reflects 13 weeks' wages and the agency may need to make adjustments. The wage conversion chart in **Attachment 3** to OCTAE Program Memorandum 17-2; DOL TEGE No. 10-16; and RSA TAC 17-1 provides a conversion tool. It is important to note that when collecting supplemental wage information for the median earnings indicator, programs must only report those wages that are actually paid to the participant during the quarter, not projected amounts based on the wage conversion chart.
2. Core programs must ensure that information gathered is representative of the participant's regular hours and earnings. This information can be acquired in an interview by program staff with the individual or the employer if the information obtained addressed the following information:
 - Average hours scheduled per week
 - Average hours actually worked per week
 - Wage per hour
 - Availability of paid leave
 - Start and end dates of employment (or start date and still employed).

In the case of the VR program, this detailed information would be included in the case notes from the meeting.

3. Activities related to acquiring supplemental wage and earnings information must conform to an agency's policies and procedures. Supplemental information reported to the core program must be consistent with the core program's reporting requirements.