**Placement Prior to Separation Data Correction**

**FREQUENTLY ASKED QUESTIONS (FAQs)**

**Data Correction Process**

1. **In what circumstances can a data correction be requested?**

A data correction can be requested for eligible students who either entered a placement between July 1, 2023, and January 31, 2024, or had not separated before July 1, 2023, but were placed prior to that date. The data correction can only be submitted for eligible students whose Date Reported (see Question 6) is before separation but, due to programming delays and errors, it either could not be entered correctly or the entire placement was not entered in the system. The Date Reported would be prior to separation, but all subsequent placement dates (e.g., date placement, date verified, and date approved) may occur either prior to or after separation from Job Corps. The placement must meet the criteria listed in PRH Section 4.4 R.2.d.1.

1. **For this data correction, will student placement dates be back dated or will the 90-day window for approval from date reported to date approved be waived?**

As part of this data correction, placements that meet the criteria outlined for a data correction will have their approved data backdated by JCDC to align with the placement verification date. This will allow the placement to be credited for the correct timeframe.

1. **What types of placements should be submitted under the data correction?**

All placements of eligible students that meet the criteria under Policy and Requirements and Handbook (PRH) Section 4.4R2d AND Exhibit 4-1 with a date reported prior to separation must be entered. If the placement is not entered, then the student cannot be credited for the appropriate CTS Placement measures, nor can an upgrade be entered (if applicable), potentially losing credit for the Job Training Match Placement and Quality Full-Time Placement measures.

1. **What criteria must the placement satisfy for the data correction?**

Placements that meet the following criteria may submit a data correction:

* The student separated as a graduate.
* The placement and the supporting documentation meet the criteria listed in PRH Exhibits 4-1 and 4-2.
* The placement meets the criteria listed in PRH Section 4.4 R.2.d.1.
* The Date Reported is between July 1, 2023, and January 31, 2024, OR is before July 1, 2023, and the student was still active on July 1, 2023.
* The Date Reported is before the separation date.
* The Date Placed is at least seven calendar days after the Date Reported, and the correct Date Approved is no later than 90 days after the Date Reported. The Date Placed, Date Verified, and the Date Approved can occur either before or after separation.

1. **Can a data correction be submitted for a Former Enrollee who entered a placement prior to separation?**

No. Placements prior to separation cannot be entered for Former Enrollees or students that separated with a Level 1 Zero Tolerance infraction.

**Placements and Related Requirements**

1. **What should be used as the Date Reported for placements that began before separation?**

The Date Reported must always be the first date the student reported to the placement (for example, first day at the job).

In a case where the student is continuing in an activity they began as part of their Job Corps training such as work-based learning (WBL) or college enrollment, the Date Reported should reflect the date that the student transitioned from attending in a training capacity. This date should be substantiated by documentation (for example, the first day of a new semester after completing Other Training Provider [OTP] studies at college, or the documented date when a student, who has completed a WBL internship, was hired at a company).

1. **Must a student who is placed before separation continue in that placement for seven calendar days after exiting Job Corps?**

The requirement to remain in the placement through seven calendar days after separation applies to circumstances where a student participates in an activity as part of their Job Corps training experience, and then enters a placement that is a continuation of that activity.

For example, a student who completes a WBL activity and is then hired by the same company must show that the placement continues for seven calendar days after separation. In such situations, the placement information is entered with the Date Reported as the first day of the *actual placement after WBL* (not the start date of the WBL activity). The placement must then continue for at least seven calendar days past separation to be credited. Additional verification documentation showing the placement continued must be obtained and uploaded.

For this data correction, if the student separated more than seven calendar days prior to submitting the data correction, the evidence of continued placement after exit must be included. If the student has not separated or it is less than seven calendar days after exit and this placement does not continue for seven calendar days past the exit date, JCDC must be notified so the placement is not credited.

For placements that are not continuations of training program activities, the requirement to remain in the placement through seven calendar days after separation does not apply. For example, an eligible student who enters employment prior to separation that meets the criteria in PRH, Exhibit 4-1 and where the job is NOT with their WBL employer does not need to be employed for seven calendar days after they exit Job Corps.

1. **Can placements held prior to or during Job Corps enrollment be credited?**

Placements prior to entering Job Corps and/or prior to earning an HSD/HSE or CTT while enrolled in Job Corps do not qualify for placement credit.

For the Graduate and Former Enrollee Placement measure, a job at which the student worked throughout their time at Job Corps would not qualify as a placement because the Date Reported through Date Approved period would have occurred before the student is eligible to be placed.

However, if after earning an HSD/HSE or CTT there is a change in the student’s placement (either before separation or during the placement window) that would be considered an upgrade (as noted in PRH, Appendix 501-Attachments, Attachment 2), then the placement can be recorded and credited if all other criteria for the placement measures are met. The date the upgrade is in effect would be entered as the date reported. Examples of an upgrade to an existing job include an increase in the job hours from part-time to full-time, the position is now a JTM due to CTT completion, or an increase in pay. Supporting documentation, as detailed in Exhibit 4-2, must be provided, including documentation of the upgrade.

1. **If a placement is entered prior to separation but the student separates for violating the Zero Tolerance policy, are any placement credits eligible?**

Centers should not submit data correction request for this situation. If the student exits for a Zero Tolerance reason, the student is not in any of the placement measure pools since students who exit under the Uncommitted status are not eligible for placement services.