

**Frequently Asked Questions  
Definitions & Data Collection Questions  
January 2005**

***Q&A Regarding “Clients”***

**Question:** Is a client who receives both training and counseling a client "once"?

**Answer:** A client is counted once annually for counseling. In addition that same client is counted once for each training unit received according to reporting training guidelines. EDMIS will not have the capacity to capture attendee-by-attendee information for training events.

**Question:** If one person has two businesses are there two clients?

**Answer:** The business is the client; therefore, it is possible that one person could be counted as two clients. Two separate Form 641s must be on file and activities for each business must be tracked separately.

**Question:** If a client file is closed after 90 days and then reopened later in the year, how is the client counted?

**Answer:** Each client is counted only once a year. If the client file is reopened during that same fiscal year, the client is not counted again. For subsequent visits, the follow-on hours of service for that year are counted as follow-up counseling sessions – and are attributable to the client.

***Q&A Regarding “Counseling”***

**Question:** If a client works with several different resource partners, would that business or individual be counted more than one time?

**Answer:** Yes. It is possible that the client could be counted more than one time. SBA has no way to track if a client receives services from more than one resource partner.

**Question:** If a counseling client returns for assistance in a new fiscal year, is the client counted again?

**Answer:** Yes. The client is counted again in the new fiscal year once they have completed a counseling session.

**Question:** If we start counseling a client in person and then end up communicating by e-mails back and forth, does the email counseling time involved count for counseling?

**Answer:** Yes. All counseling time can be attributable to the client throughout the fiscal year, regardless of how counseling services were delivered. The follow-up time in this case would be counted as e-mail follow-up – and all hours are attributable to the client.

**Question:** If there are two people looking to start a business together and they both come in for counseling, shouldn't we have each of them fill out and sign a 641 for liability purposes?

**Answer:** Both persons can fill out a 641, but you only count and report the one business venture as a client.

**Question:** Are we supposed to be using the new intake forms (641) right now?

**Answer:** No. You should continue to use the existing form 641, for fiscal year 2005. The new form 641 will be used beginning on October 1, 2005 (fiscal year 2006).

**Question:** Can the resource partners use the new forms if preparations have already been made to do so?

**Answer:** Yes. As long as the resource partner continues to report all the information required by SBA in FY 2004.

**Question:** Can resource partners use intake forms that have been designed for the specific location instead of the 641 and 641A?

**Answer:** Yes. As long as all elements of the 641 and 641A are included on the intake form, including the signed liability waiver.

**Question:** Once a week we hold a 3-hour group counseling session where we discuss specific topics of the business plan process. Based on the new definitions, how should we count them?

**Answer:** Based on the information provided, this would be best counted as a training session, and not as counseling. SBA is moving away from the group-counseling format.

**Question:** Will a client need to sign a new SBA Form 641 each year to be counted as a new client?

**Answer:** The client's signature will need to be on file. There will need to be a transfer of data from the old SBA Form 641 to the new SBA 641 with the integration of the new EDMIS system effective October 1, 2005. Client data will not migrate to the new EDMIS. However, an old client signature on file will still be valid.

### ***Q&A Regarding "Online/Telephone Counseling"***

**Question:** When collecting information from the client for telephone counseling or online counseling, can a counselor indicate on the 641 that the client has agreed to the waiver by initialing the form?

**Answer:** No. There must be a signature in the file from the client (either a fax of the 641 or a mailed in copy of the 641) indicating that the client has agreed to the conditions of the waiver. It does not suffice to have the counselor complete the waiver for the client. Until the SBA has electronic signature capabilities, we are requiring that a signature be on file indicating that the client has agreed to the liability waiver.

**Question:** What is the difference between online counseling and e-mail communication?

**Answer:** E-mail counseling is communication online that occurs as an aftermath or follow up to face-to-face counseling. On the new forms effective in FY 2006, there will be areas to indicate what type of counseling occurs and we will be able to track it. Online counseling is where the onset of counseling occurs online, most commonly through a web site set up to accommodate this. After the initial onset of the counseling, follow-up counseling can be done in any medium – online, phone, and in-person. With the new forms in effect in FY 2006, there will be a place to indicate what type of initial onset occurred (in person, online, phone) and it can be tracked that way.

### ***Q&A Regarding “Training”***

When trying to decipher whether something is training, the first thing one should look at is whether multiple SBA resource partners (SBDC, SCORE or WBC) are involved. If only one SBA resource partner is involved, whether they are doing the training themselves or in partnership with invited guests or other non-SBA partnered events, that resource partner takes credit for the entire event as a training.

When more than one SBA resource partner is involved (SBDC, SCORE or WBC), depending on the situation, training attendees and hours may need to be split as agreed by the partners. For example, if SBDC and SCORE co-sponsor an event at which neither of them do any training but have invited guests doing it, they would split the training attendees and hours as agreed. However, in this same scenario if SBDC does an hour training on a topic area (45 mins training and 15 mins Q&A), training attendees and hours are still split between SBDC and SCORE and, in addition, SBDC would also count the additional training hour and attendees for their individual session assuming the other training requirements are met.

**Question:** Is there a supplemental form for the SBA Form 888?

**Answer:** Yes, it will be issued in an upcoming procedural notice. The supplemental form will include a breakdown of demographic data for ethnicity and race. OMB allowed an extension on the old Form 888 with the provision that SBA resource partners and SBA district offices attempt to collect ethnicity and race information.

**Question:** Can training provided to lenders by district offices be counted as training for Entrepreneurial Development (ED) goals?

**Answer:** No. To be counted as ED training, the training topic must be related to an ED program or service or be entrepreneurial in nature (a structured program of knowledge, information and/or experience on a business-related topic). Lender training does not meet these criteria.

**Question:** Our center offers a pre-business training series that is offered in four separate sessions. Attendees can sign up for the entire series or just one segment. How should I count and report on this training format?

**Answer:** Since the training event is being offered as a series, you would report on the event using one SBA Form 888. Attendees would be counted once, no matter how many sessions of the course they attended. So if an attendee attended all four of the sessions, they would be counted once for the entire series. You will also count once an attendee who attended just one of the four training sessions. An attendee list for each session should be attached to the SBA Form 888.

**Question:** How are training attendees counted if they sign up for two separate training seminars on different topics?

**Answer:** If a training attendee signs up for two separate trainings in one year, they would be counted twice. The SBA Form 888 and EDMIS do not have the capability to allow for attendee-by-attendee information for SBA training. However, if an attendee attends different sessions of a long-term training class, they are counted once.

**Question:** If SCORE presents for 15 minutes at an event, SBDC presents for 15 minutes at the same event and then WBC presents for 15 minutes at the event and a Chamber of Commerce representative presents at the event for 15 minutes, how is it counted?

**Answer:** The event must total one hour in length and meet all the reporting requirements for training such as evaluations and the SBA Form 888. Resource partners must determine how they are going to divide the attendee numbers and take credit for them amongst each other. Each attendee can only be counted once for this event.

**Question:** With regard to training breakout sessions, it appears that the total number of attendees reported at various breakout sessions of an event can exceed the total number of attendees at the event. If the event has 30 attendees and three breakout sessions in the morning and three breakout sessions in the afternoon and ten people attend each breakout session, a total of 60 attendees could be reported.

**Answer:** Breakout sessions can be counted as training as long as they meet the same requirements as regular training. There would need to be an agenda, SBA Form 888, an attendee list, and evaluation forms and the session must last for one hour. Every effort to collect race/ethnicity information must also be made. Otherwise, the breakout should be counted as an information transfer. It is correct that attendees may be counted more than

Working Document

01-06-2005

once, but as long as the requirements for the training are being met – the definition is being implemented correctly.

**Question:** If a seminar includes a speaker or panel of speakers discussing a topic for 45 minutes and then there is a 15-minute question and answer session from the audience does it count as a training session?

**Answer:** Yes. If the session is scheduled to last for one hour and the other requirements of training are met, this would count as training.

**Question:** If the SBDC in partnership with a Chamber of Commerce puts on 2 hour event featuring 3 successful entrepreneurs as speakers; however, there is no SBDC consultant who is a speaker - how is this training counted?

**Answer:** This is a training session (2 hrs.) and should be counted by the SBDC as such. SBDC would claim credit for all attendees and normal requirements apply for training reporting eligibility (evaluation, attendee list, 888, etc.).

**Question:** If the SBDC puts on a training event on worker's compensation, and invites an outside speaker to conduct the entire training -is this considered a training event?

**Answer:** Yes, if it is more than an hour in length, relates to small business management and meets the other training requirements, the SBDC gets credit for all attendees.

**Question:** If the SBDC puts on a training event on procurement in partnership with a local government agency, an SBDC consultant is part of the panel speaking for only 15 minutes - does this not count as training?

**Answer:** Training must be for an hour in total - either sponsored solely by the SBDC (or hired consultant) or jointly with another resource partner.

**Question:** The SBDCs conducts Pre-Venture Seminars and were previously counting them as counseling hours with clients filling out 641s and considering them as group counseling, however, now that the definitions have changed, how these should be counted?

**Answer:** SBA is moving away from group counseling instead calling these training sessions. But they must also meet the definition of training, i.e. 1 hour in length, an evaluation form, list of attendees, a form 888 and substantive content requirements. If they don't meet the training requirements, then they would be information transfers.

**Question:** Please address new guidelines or restrictions for co-sponsored events. Our WBC has co-sponsored many classes with the SBDCs in our state and neither party is entirely sure how the numbers will be counted this year.

**Answer:** There are certainly no restrictions with conducting co-sponsored events, and SBA certainly wants to encourage these types of activities. For joint events that meet the requirements of a training event, the SBA co-sponsors should agree in advance who will take credit for the attendees. If the event were being jointly planned and executed, for instance, the WBC and the SBDC would each get credit for 50% of the attendees.

However, if the event has breakout sessions, the breakout sessions can be counted as training as long as they meet the same requirements as regular training. There would need to be an agenda, SBA Form 888, an attendee list, an evaluation form and the session must last for one hour. In this last case, the attendees of this session might be counted twice, once in the breakout and again by the sponsor of the event. Please note, however, that lender training does not count as ED Training.

**Question:** If an event is hosted by other entities such as the Chamber of Commerce or economic development groups, should the ED resource partner include the training presentations (of an hour or more) that they make at the event?

**Answer:** Yes. The ED resource partner can count the training they present at an event sponsored by an outside organization if it meets the definition of training. There needs to be a completed SBA Form 888, agenda, evaluation information, and the program must last for at least one hour. If these requirements are not met, the presentation must be counted as an information transfer.

**Question:** If we conduct a one hour presentation to a college or high school business class, can that be counted?

**Answer:** Yes. As long as the training is a structured program of knowledge, information or experience on a business-related topic, training to college or high school business students can be counted. As with all training, there needs to be an agenda, attendee list, evaluations and be documented with an SBA Form 888. Additionally, every attempt to collect race/ethnicity information must be made.

**Question:** If you are providing a long-term training course with multiple segments, is an evaluation form needed at the end of each segment?

**Answer:** No. An evaluation is only required at the end of the course.

### ***Q&A Regarding "Information Transfers"***

**Question:** How do we count information transfers?

**Answer:** Information transfers are counted based on activity alone. If the client accesses information day one and on day two asks for additional information - two information transfers have occurred.

**Question:** If a marketing brochure or e-mail is sent to the target consumer, is it considered an information transfer?

**Answer:** Yes. The exchange is considered an information transfer if the information is sent to a specific targeted consumer or at the request of a counselor. However, the circulation of a newsletter or mass mailing does not count as an information transfer.

**Question:** With regard to information transfers, do they include visitors to an exhibit booth?

**Answer:** Yes. Visitors to an exhibit booth can be counted as an information transfer as long as there was a substantive exchange of business related information at the booth. (You should not include everyone that signs up for the trade fair.)

**Question:** If a contact with an individual is recorded as an information transfer and there is a follow up later, do we aggregate the total amount of time to receive credit for the 30 minutes of counseling?

**Answer:** No. We are not requiring resource partners to collect client-by-client data on information transfers. Information transfers are reported as an aggregate number. Therefore, we would not expect you to link an information transfer to a counseling session. These two activities should be kept separate, even if someone who received an information transfer returns for counseling assistance. The assistance rendered later would have to meet the definition of counseling on its own merits

**Question:** If we insert a brochure in our newsletter, would this be considered an information transfer? This brochure is done monthly and it includes a schedule of classes and events. If the document were mailed separately, would it be considered an informational transfer?

**Answer:** It would not count as an information transfer if the brochure were included with a newsletter. Circulations of bulk mailings should not be counted. However, if a client called and asked for information on classes and the brochure were mailed as a response, this would count as an information transfer.

### ***Q&A Regarding "Mentor-Protégé Roundtables"***

**Question:** Do mentor-protégé roundtables need to be reported as counseling, training or informational transfers?

**Answer:** Yes. ED mentor-protégé activities would count as counseling, training, or as an information transfer depending on the format of the sessions. EDMIS will not have a separate section for mentoring roundtables.

### ***Q&A Regarding "Other Topics"***

Working Document

01-06-2005

**Question:** Can counseling and training be counted if done by someone contracted by the resource partner (or other third party), not an employee of the resource partner?

**Answer:** Yes. For the Women's Business Center program, up to 49 percent of the training and counseling can be provided by a third party. The SBDC program also allows for third parties to provide training.