**Policy PY13-08 Attachment-A Date of Exit & Global Exclusion Guide**

**DATE OF EXIT**

Information on Date-of-Exit is outlined below; however, for a more in depth review, please read TEGL 17-05, which can be found at: <http://wdr.doleta.gov/directives/>

**What constitutes a WIA Service?**

A service is something that goes beyond provision of or receipt of basic information that the participant can self-access.

A service is a staff-assisted session that imparts something that has specific value to the participant.

While it is very important to document information about participant status, outcomes and contacts; **it is critically important to document a service. WHY???** …Because:

* ETA requires that participants who haven’t received a service within 90 days be exited.
* All but one of the common performance measures is directly tied to participant exit-date.
* States’ Performance Reports are based on participant exit-date.
* If date-of-exit is not valid, the performance reports are not valid.
* If the performance reports are not valid, States can be sanctioned.
* Sanctions may make result in reduction of formula funds and loss of incentive grants.

We currently use the OSOS Status Screen to enroll clients into activities and report and track the length a participant is active in a particular type of activity, but activities alone are not services. In addition to entry of status, **case managers must document the services that are being provided.**

For example:

* **CM** in the status screen implies that a participant is receiving case management services. However, case management activity alone does not constitute a particular service. In many instances, case managers are only gathering information actions such as calling a participant to find out if s/he is working are not a service, but rather an administrative function necessary for tracking and reporting, the action has little direct value to the participant. **Assisting** a participant in determining how much money they will need while in training or **assessing** a participant’s progress in completing ISS goal attainment would be considered **case management services**.
* **JS** in the status screen implies that a participant is actively involved in Job Search. Case managers must document the actual services that are being provided while an individual is enrolled in this category. For example documenting in the Participant Service Log that you are **conducting** a mock interview with the participant or **teaching** them how to use CWRI tools to research the types of skills and work preferences for a position they wished to apply for, would be considered **Job Search Services.**
* **GT/TA** in the status screen implies that a participant is receiving training services. For accurate reporting, complete information is required, including:
  + The Start and End Date of the training
  + The type of training
  + The name of the training vendor, school or employer providing the training
  + The credential expected to be earned upon successful completion of the training

**Participant Service Log:** OSOS is being changed to auto-exit participants when they have received a service in over 90 days. Case Managers will be required to document all services in the Participant Service Log Screen. Case managers will identify the specific service being documented either through selecting the service from a drop down menu or explaining the service in the dialogue box in this screen.

**Source Documentation**

Specific source documents must be used to validate data. The level of documentation required becomes more stringent with each level of service. A registration or application alone may suffice as documentation for provision of a **core service**, but once a participant is provided **intensive or training services** a higher level of documentation is required, such as pay stubs for earnings, or public assistance records for low income.

**Date-of-Exit**

Many staff members **incorrectly** exit a participant from the program because they have achieved an outcome, such as entered employment.

**!!!! PARADIGM SHIFT!!!** Participants must exit when they are no longer receiving a service.

**Auto-Exit**

Starting July, 2014 all participants who have not received a documented service in 90 days, as documented in the Participant Service Log Screen, will be auto exited from the program.

**Date-of-Exit** is applied retroactively to the last day the participant received a documented service funded by the program, ***UNLESS***:

1. the participant is scheduled for a **Future Service**, or
2. the participant has a documented **Gap in Service**

**Gap in Service**: A participant should not be exited if there is a documented requirement for a gap in service of greater than 90 days but not more than 180 days.

A **Gap in Service** can only be permitted under the following circumstances:

* There is a delay of more than 90 days before the start of training, ***or***
* There are health or medical conditions or a requirement to care for a family member with a health or medical condition that will temporarily affect the participant’s ability to be actively involved in the program, ***or***
* A temporary move from the area prevents the individual from participating in services (such as performance of duties in the National Guard), ***and***
* The reasons for the Gap in Service and the participant’s intent to complete the program are fully documented.

*A Gap in Services should not extend beyond 180 days; however, in some exceptional circumstances a gap in services of more than 180 days may be warranted, case managers must carefully document the exceptional circumstances in such instances.*

**Hard-Exit:** The only instance in which a hard exit *(i.e. not an auto-exit*) can occur is when a program has ended (NSAI, ARRA, NEG), or when a participant meets the requirements for a Global Exclusion.

**Global Exclusions:** Are exclusions from the common performance measures for exits that are beyond the control of the participant or the program and that are expected to last for an undetermined period beyond 90 days.

A participant affected by any of the following, either at time of exit or during the three quarter measurement period following exit, may be excluded from common measures provided the reasons are **properly documented.**

* Institutionalization or residing in an institution or facility providing 24 hour support, such as a prison or a hospital, and is expected to remain there for 90 days or longer
* Health/Medical or Family Health/Medical Care receiving medical treatment, or providing care for a family member with a health/medical condition, that precludes entry into unsubsidized employment or continuation in the program. *Does not include temporary conditions expected to last less than 90 days*
* Participant is Deceased
* Called to Active Duty a member of the National Guard or Reserves and is called to active duty for 90 days or longer
* Relocated to a Mandated Program Applies to youth only but does not include Job Corps. Applies to youth in foster care or other mandated residential or non-residential program that the participant must move from the area to participate in
* Invalid or Missing Social Security Number because measures require staff to match personally identifiable client records with wage and other administrative data in order to obtain outcome information, staff may exclude from all measures those participants who will not voluntarily disclose a valid social security number.

**Follow-Up** activities are designed to ensure job retention, wage gains and career progress, but do not count as a service that would extend the program participation period. Follow up activities may include:

* Additional career planning / counseling;
* Contact with the participant’s employer (including assisting with work-related problems);
* Referral to peer support groups;
* Provision of information about educational opportunities;
* Informational mailings and/or referrals to supportive services in the community

**Other Activities that do not extend the participation period:**

* Determination of eligibility to participate in another community program;
* Case management services;
* Other required case-load management activities that involve contact with the exited-participant or his/her employer to gain information regarding employment status, educational progress or need for additional services; and
* Income maintenance or support payments such as UI benefits, TANF, or Food Stamps.

*NOTE: this excludes trade readjustment allowances or needs based payments funded through TAA,WIA, or NEGs which are elements of a training program that do delay program exit because such payments are tied to continuous participation in skills training.*

*Although follow-up activities don’t extend the program participation period they are important and may have a direct positive impact on the employment retention and earnings of participants entering employment.*

**Activity in the Maine Job Bank (such as a job referral) does extend program participation, because such activity is considered and recorded as a service.**