**Workforce Development System
POLICY & PROCEDURE**

Subject: **Date of Exit – Data Element Validation**	Policy #: **PY13-08**

To: **Local Board Directors**
   WIA Service Providers
	From: **Pete Pare, Director**
	       Bureau of Employment Services

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References:
    • WIA Section 136
    • 20 CFR 667.300 (e)(2)
    • TEGL 17-05
    • TEGL 28-11 Change I	

Background:

The Workforce Investment Act requires that states accurately report participant performance data. In order to assure that quarterly and annual performance reports are accurate, the State is required to conduct Data Element Validation (DEV) on participant files. In a recent review of over 1100 files, the rate of error for "**Date-of-Exit**" exceeded 83% in some local areas. Error rates above 5% are insupportable. High error-rates are incurred due to both deficiencies in OSOS *and* case management practices.

Because the majority of Common Performance Measures are based on Date-of-Exit, it is critical that the Date-of-Exit element be documented correctly and monitored closely. When the validity of a report is called into question, States can be sanctioned which can result in a reduction of regular formula funds or denial of incentive funds.

Policy:

BES, LWIBs and Service Providers will implement the following action steps to address and reduce the high Date-of-Exit validation error-rate to below 5%.

DEV Error-Rate Report

- **BES will** provide each Local Area with a Data Validation Error Report at the close of each annual data validation review period. The report will delineate DEV results for all files reviewed for the Local Area and will show error-rate percentages for each data element for each case manager.

- **Local Areas will** have 90 days to ensure that service providers have reviewed data element file errors with each respective case manager and that each case manager clearly understands: 1) why the element failed, and 2) the correct source documents or data entry steps required for the element to pass.

- **Local Areas will** provide a follow-up letter to BES within 90 days of receipt of the Data Validation Error Report providing assurance that the above requirement has been implemented and informing BES of any concerns, issues or outcomes discovered as a result of this exercise.

2014 OSOS Changes: (*The changes identified are expected to be in place by July, 2014)*
- **OIT will** reprogram OSOS to provide a specific field for documentation of type and date of service. OSOS will automatically exit any participant who has not received a documented service in 90 days.   Any participant that has not received a service in 90 days will be exited as of the date of last documented service.

- **OIT will** reprogram OSOS to provide a specific field for documentation of type and duration of Training Services, to include selection of provider from ETPL list, enrollment and service start and end dates, training provider information and training program title and training start and end dates.

- **OIT will** issue a warning to case managers when a participant on their case load list has gone without a documented service for more than 75 days.

Technical Assistance/Staff Training:
- **BES will** provide Data Element Validation (DEV) training to LWIBs and Local Area service provider staff at the close of each DEV annual review period. The training will provide an overview of DEV purpose, process and requirements. Staff will receive: an updated DEV Manual, feedback on common errors for their area, a review of acceptable source documentation and an opportunity for case managers to better understand common errors identified in their own case files.

- **BES will** provide training, in July, 2014, regarding changes in the OSOS system that will ensure participants are auto-exited as of the last date of service. A guide on Date-of-Exit reviewing the requirements surrounding date-of-exit is included with this policy as (*Attachment A*).
  The training will review proper documentation and data entry of: service provision and requirements related to Date-of-Exit, Global Exclusion, Gap-in-Service, and Training Activity and will clarify the difference between a "service" and an "administrative or case management action."

Additional Monitoring Requirements:
- **Local Areas will** conduct Service and Exit-Date reviews on each participant file reviewed as part of regular Annual Subrecipient Program Monitoring using the new Participant File Review Checklist which will be used in conjunction with the regular file review monitoring form. Findings must be shared with service provider staff and corrective action steps implemented to address the findings.

- **BES will** conduct Service and Exit-Date reviews on each participant file reviewed as part of regular Annual Local Area Program Monitoring using the new Participant File Review Checklist in conjunction with the regular file monitoring too. Findings will be shared with Service Provider staff and corrective action steps implemented to address the findings.

- **BES will** conduct annual random sample DEV reviews of Local Area files from each CareerCenter. Findings will be shared with Local Areas and provider staff.

This policy will be reviewed annually.

Attachment A: **A guide on Date-of-Exit**

Attachment B: **Participant File Review Checklist** *(Addendum to regular file review tool)*

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Attachment-A   **DATE OF EXIT**   **Data Element Validation Guide**

Some basic 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 basic information that can be self-accessed by the participant and that goes beyond information gathering.
- A service is a staff-assisted session that imparts something that is **value-added** for the participant.

While it is very important to document information about participant status or outcomes; **it is critically important to document a service. WHY???** …Because:
- ETA requires that participants who don't receive 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 report is not valid.
- If the performance report is not valid, States can be sanctioned.
- Sanctions may make States' ineligible for incentive funds, required to pay back incentive funds, or result in up to a 5% reduction in regular formula funds.

In Maine we use the Status Screen to enroll clients into activities. Activities alone are not services.
The Status Screen is used for reporting and tracking of activities. In addition to entry of status, case managers must document that **services are being provided**, they will do this in the Participant Service Log Screen.

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 service. In most instances, case managers are actually gathering information (i.e. performing a function). Calling a participant to find out if s/he is working is **not** a service; it is an administrative function necessary for tracking and reporting, but has little value to the participant. A case management service would be **assisting** a participant in determining how much money they will need while in training or **helping** a client decide which method of occupational training would be best suited to their learning style.

- **JS** in the status screen implies that a participant is receiving services related to 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 **conducted a mock interview** with the participant or **taught them how to use CWRI tools**.

- **GT/TA** in the status screen implies that a participant (youth/adult) is receiving training services. For accurate reporting, additional 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

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- o The cost of the training
- o 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 not had a documented service in over 90 days. Case Managers will be required to document all services in the Participant Service Log Screen. Case managers will identify whether the service being documented is a WIA core, intensive, or training service and will also be required to list the specific service in the comment box, if that service is not already contained in the drop-down box.

Data Alignment Accuracy
For a data element to be accurate, dates in the MIS system must align. For example, if the Status screen shows a training end date of October 3, 2013 (*originally entered as an estimated end-date*) but a case note states that the participant completed training on October 30, 2013 and then a paper certificate in the file shows they completed the training on September 28, 2013 then the <u>training end-date</u> element fails. All dates must align for an element to pass validation.

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

Auto-Exit
<u>Starting in 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.</u>

Date-of-Exit is applied retroactively to the last day the participant received a documented service funded by the program, *UNLESS*:
   a) the participant is scheduled for a **Future Service**, or
   b) 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 <u>but not more than</u> 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.

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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 <u>do not extend</u> 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.