

POLICY TRANSMITTAL		
SUBJECT:	Common Exit	Policy/Guidance No.: #4 PY2021-22
APPLIES TO:	Workforce Services WIOA Adult / Dislocated Worker / Youth and Trade Adjustment Act (TAA) Service Providers	Effective Date: April 30, 2021 Revised Date: Expiration Date: Indefinite
REFERENCE:	<ul> <li>Administrative Policy 115</li> <li>Training and Employment Guidance Letter (TEC</li> </ul>	GL) 19-16

#### I. PURPOSE

The purpose of this policy is to provide staff the minimum requirements for the common exit of program participants for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP) and Trade Adjustment Assistance (TAA) programs, and procedural quidance for the associated processes.

#### II. BACKGROUND

WIOA establishes performance accountability indicators, aligns performance-related definitions, ensures comparable data collection, and integrates performance-reporting requirements to assess the effectiveness of states in achieving positive outcomes for individuals served by the workforce development system. Common exit is intended to ensure a more efficient and effective integrated service delivery system, track the coordination of services, and align performance reporting.

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# **Managing Disengaged Participant Exits**

Managing disengaged participants will require staff provide a detailed case note that explains the effort to reengage the participant prior to closing open activities. All open activities must be closed for participants that have not received a participating service, cannot be located or contacted, refuse additional workforce services or has moved out of the service area for more than 90 days and no future services are scheduled.

A participating service occurs when the staff and participant are actively engaging with each other and there is an exchange of information. If no participating service occurs, then close any open activity and allow the system to create the Closure and Soft Exit. The only exception to this will be when the Closure is due to an Exclusion, as indicated below.

#### **Exclusions**

Exclusions from performance are granted when a participant meets one of the reasons below and has been in that status for more than 90 days, with the exception of the deceased. Documentation must be obtained and maintained in the file to validate the reason and status.

- Institutionalized
- Health/Medical
- Deceased
- Family Care
- Reservist Called to Active Duty
- Foster Care (WIOA Youth only)

### Case Closure (WIOA Adult, Dislocated Worker, Youth, & TAA)

The participant's case should be formally closed in Employ Miami Dade (EMD) / Employ Monroe (EM), when it has been determined that a participant no longer requires services because he/she has entered employment or education, become disabled or otherwise incapable of working, or the participant voluntarily opts out of service. A detailed case note must be added upon closing the case.

The steps below provide guidance on what should occur prior to closing an activity or the case due to an "Allowable Exclusion" staff must:

- Step 1: Reach out to the participant to re-engage by providing a participating service or see if s/he meets one of the Exclusions and obtain the proper documentation.
- Step 2:if the participant cannot be reached, proceed to close any opened activity within the current quarter.

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- Step 3: Ensure the Individual Employment Plan/Service Strategy (IEP/SS) Plan has been closed out. (See the Virtual OneStop User Guide for Staff, Section 4: Individuals Case Management for further guidance);
- Step 4: Ensure all services have been closed across all programs included in common exit (WIOA, WP, TAA);
- Step 5: Enter any credential(s) earned during the program, including the type, verification and credential date to the Closure Information tab or Credential Section. If the credential is not yet available, staff have up to one year after exit to report the credential attainment. (see the Virtual OneStop User Guide for Staff, Section 6: Programs WIOA for further guidance);
- Step 6: Make sure any Measurable Skills Gains (MSG) attained during the program have been added to the participant's Measurable Skills Gain ribbon or, individuals below postsecondary education level literacy/numeracy gains or to the Educational Functioning Level for Measurable Skills Gain ribbon (see the Virtual OneStop User Guide for Staff, Section 6: Programs WIOA for further guidance); and
- Step 7:Add any unsubsidized or On-the-Job Training (OJT) employment entered during the program or at closure to the **Add Employment ribbon** (see the Virtual OneStop User Guide for Staff, Section 6: Programs WIOA for further guidance).

### **Follow-Up Services**

For WIOA Adult and Dislocated Worker programs, follow-up services may begin immediately following placement into unsubsidized employment if no future services (other than follow-up services) are scheduled or expected. For the WIOA Youth program, follow-up services may begin immediately following the last date of service if no future services (other than follow-up services) are scheduled or expected.

Follow-up services do not cause the exit date to change, delay exit or trigger re-enrollment in the program. These services must be provided and documented in EMD/EM unless the participant refuses services. If a participant refuses follow-up services, staff must document the refusal with a case not in EMD/EM, (see the Virtual OneStop User Guide for Staff, Section 6: Programs – WIOA for further guidance).

EMD\EM follow-up service codes are outlined in the Employ Florida Service Code Guide, see below.

Follow-Up Services		
Activity Code Activity Title		
F01	Referral to Community Resources	
F02	Referral to Medical Services	
F03	Tracking Progress on the Job	
F04	Work-Related Peer Support Group	

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F05	Assistance securing better paying job
	Career development and further education
F06	planning
F07	Assistance with Job/Work Related Problems
F08	Adult Mentoring
F09	Tutoring
F10	Leadership Development
F11	Other Follow Up Service, not classified
F12	SS-Transportation
F13	SS- Purchase work related uniforms/attire
F14	SS- Work related tools
F15	SS- Housing Assistance
F16	SS- Utilities
F17	SS- Dependent Care
F18	SS- Medical
F19	SS- Incentives/Bonus

## **Conducting Follow-up after Exit**

Follow-up after exit includes contacting or attempting to contact a participant for verifying the employment status and obtaining documentation for the case file in order to report a performance outcome. As well as, verifying the attainment of a certificate or degree.

Five attempts to contact the participant must be made before the follow-up is closed with no contact. Each of the attempts must be documented in the case notes and the attempts should vary by the time of day, day of week, and means of contact. The type of follow-up recorded will depend on the type of service each participant is in need of at the time of contact.

The follow-up will be conducted on a quarterly basis as per the table below:

#### **EXAMPLE:**

Follow-Up	Cases closed and exited between 04/01/2021 and 06/30/2021 (MSG)	
QTR's After Exit	Date	Performance
1st	07/01/2021 - 09/31/2021	Ensure participant has employment
2nd	10/01/2021 - 12/31/2021	Employment 2nd QTR and Median Earnings
3rd	01/01/2022 - 03/31/2022	Ensure participant has employment
4th	04/01/2022 - 06/30/2022	Credential and Employment 4th QTR

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### **Managing Future Participants**

All staff are required to check EMD/EM for prior registration when an applicant is seeking services. If the applicant was prior enrolled in WP/WIOA, after assessing the need(s) create an activity using one of the follow-up codes to record the service rendered. A new WP participation and/or WIOA application may be created to provide the necessary workforce services that cannot be performed by rendering follow-up services.

Every participating service provided to a participant, once recorded, establishes a new exit date and extends participation for ninety (90) days. Self-service, information-only services or activities, and follow-up services do not delay, postpone or affect the date of exit. Participating services that establish (trigger) or extend participation are identified in the Employ Florida Service Code Guide. The management of participant services includes regular, direct contact with the participant on all aspects of their workforce development needs.

Direct contact is considered to have occurred when staff and the participant have exchanged information, or the participant has agreed to the service being provided by staff. Staff should ensure that direct contact is made at a minimum of every thirty (30) days with the participant to maintain the highest level of individual service. Determined on an individual basis, contact that is more frequent may be necessary and is encouraged. Attempts to re-engage, such as sending workshop flyers or job leads by mail or email or leaving telephone messages without receiving a response, do not constitute direct contact for the purpose of providing a service or keeping an activity open. Direct contact may be performed in-person or remotely and may be conducted by mail, telephone, email, or other documented means of contact. Such contact should result in a participating service being provided to the participant and it must be documented.

## **Participating Services**

Providing participating services that are not listed in the Follow-Up Services (above), can lead to a new WP registration or WIOA enrollment/participation for an applicant, if it has been determined and detailed case noted that this level of service is necessary to gain meaningful employment and/or training. The participating services for the Adult, DW, TAA and Youth are listed below.

# Individualized Services (Adult, DW, TAA)

- a) Comprehensive and specialized assessments of the skill levels and supportive service needs of eligible adults and dislocated workers, which may include:
  - 1. Diagnostic testing and use of other assessment tools; and
  - 2. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- b) Development of an individual employment plan (IEP) to identify the employment goals, appropriate achievement objectives and appropriate combination of services for the participant to achieve his or her employment goals;
- c) Group and/or individual counseling and mentoring;

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- d) Career planning (e.g., case management);
- e) Short-term, pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare the participants for unsubsidized employment or training; in some instances pre-apprenticeship programs may be considered as short-term prevocational services;
- f) Internships and work experiences that are linked to careers;
- g) Workforce preparation activities that help participants acquire a combination of basic academic skills, critical thinking skills, digital literacy skills and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of post-secondary education, training or employment;
- h) Financial literacy services;
- i) Out-of-area job search assistance and relocation assistance; and
- j) English language acquisition and integrated education and training programs.

## 14 Elements (Youth)

All eligible participants must be enrolled WIOA in order to receive services. These services are provided on an individualized basis as needed.

These services include but are not limited to:

- 1. Tutoring, study skills training, instruction, and dropout prevention.
- 2. Alternative secondary school services or dropout recovery services.
- 3. Paid and unpaid work experience.
- Occupational skills training.
- 5. Education offered concurrently with workforce preparation and training for a specific occupation.
- 6. Leadership development opportunities.
- 7. Supportive services.
- 8. Adult mentoring.
- 9. Follow-up services.
- 10. Comprehensive guidance and counseling.
- 11. Financial literacy education.
- 12. Entrepreneurial skills training.
- 13. Services that provide labor market information.
- 14. Postsecondary preparation and transition activities.

### **Training Services**

The training services that will be made available will provide tools and resources to assist participants in meeting the skills and experience needs of the customer. From technical skills, soft

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skills, work experience, traditional classroom instruction and employer-anchored training services help close the skills gap between the participants and the customers.

Eligibility criteria for training services under WIOA consist of the following:

- a) Individuals who, after an interview, evaluation, or assessment, and career planning have been determined to be
  - Unlikely or unable to obtain or retain employment that leads to economic selfsufficiency
  - In need of training services to obtain or retain employment that leads to economic self-sufficiency, and
  - Have the skills and qualifications to successfully complete the program

Listed below are types of training services to be made available to participants based on the development of the IEP/ISS that includes the short- and long-term employment goals.

- Individual Training Account (ITA) is used for traditional classroom training services that
  are intended to provide enrollees the maximum customer choice in training selection and
  provide the flexibility needed to provide training in high demand occupations. ITAs are
  funded for training providers who have met eligibility of the State's Eligible Training
  Provider List (ETPL).
- On-the-Job Training (OJT) is another training option through WIOA funding that provides work-based learning rather than classroom instruction. The intention of an OJT agreement is to benefit both the participant and the customer by:
  - Bridging the gap between a worker's current skills and the skills the customers are looking for;
  - Providing reimbursement to the employer for the costs associated with training the OJT trainee; and
  - Promoting good paying jobs.
- Apprenticeship Training Accounts (ATA) is a formalized, structured training program that
  combines on-the-job learning with related practical and technical instruction in an
  occupation. The length of the apprenticeship training will vary by occupation. The
  apprentice is hired as an employee and earns wages once accepted into the program.
- Customized Training (CT) is provided based on a specific training curriculum "customized" to the particular workforce skill needs of the participant or group of participants. CT is designed to meet the unique training needs of a customer or a group of customers. CT can be used for training new or existing workers (referred to as Incumbent Worker Training or (IWT).

# Non-Participating Services

Contact where the participant does not engage will not be considered direct and must not constitute a participating service. An offer to provide a service or a scheduled appointment to

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provide a service must not be recorded as a participating service, although the contact and the results may be entered as a case note or non-participating service.

If the participant has not been provided with a participating service for 90 consecutive days and no future services are scheduled, any opened activity must be closed by the end of the current quarter. The EMD/EM system will create the "Closure" 90 days after the "Last Service Date". The soft exit occurs 90 days from the date of "Closure", providing that the participant does not receive any services during those 90 days prompting the Follow-Up schedule.

The participant's exit must not be prolonged by staff extending service dates, removing exits, or opening new services unless it is demonstrated and documented that the participant has unmet needs and is actively being served. Additionally, non-training services in Employ Florida must not be future dated to extend participation. Attempts to re-engage a participant do not constitute a participating service for the purpose of providing a service or keeping an activity open. These contacts must instead be documented by case notes or by the appropriate non-participating service. Prolonging exit due to the inability to contact a participant is inappropriate.

The following items do not constitute a service or contact with a participant for the purpose of extending the activities / services participation:

- Leaving voicemail messages for the participant;
- Speaking with relative(s) of the participant who are not their guardian;
- Scheduled services or an offer to provide services;
- Sending flyers, letters or postcards;
- Speaking with the participant's parole officer;
- Casual, unscheduled conversations with the participant in public;
- Having the participant bring in time sheets and/or attendance records for payment without providing meaningful guidance, service or conducting a review of the participant's Individual Employment Plan (IEP); and
- Contacts to obtain employment status, educational progress, need for additional services or income support payments without providing meaningful guidance, service or conducting a review of the participant's Individual Employment Plan (IEP).

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