



Policy

SECTION: WIOA, Wagner Peyser, TAA	POLICY#021-C0115	PAGE: 1 of 6
TITLE: Common Exit		EFFECTIVE DATE: 8/19/2021
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PURPOSE: To provide guidance on the minimum requirements and procedural process associated with the common exit of program participants in EmployFlorida (EF), state system of record, for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP) and Trade Adjustment Assistance (TAA) programs.

BACKGROUND: The Workforce Innovation and Opportunity Act (WIOA) establishes performance accountability indicators, aligns performance-related definitions, ensures comparable data collection, and integrates performance reporting requirements to assess the effectiveness 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. An individual who is participating in any program covered by the common exit policy will not exit (and be counted in performance) until the individual is no longer being served by any program to which is applicable.

Common exit is applicable to the following programs:

- a) WIOA Title I – Adult/Dislocated Worker, Youth
 - a. National Dislocated Worker Grant (NDWG)
- b) WIOA Title III – Wagner Peyser (WP)
 - a. Jobs for Veterans’ State Grant (JVSG)
 - b. Migrant and Seasonal Farmworkers (MSFW)
- c) Trade Adjustment Assistance

CSTB’s Common Exit Policy meets all the requirements outlined in the CareerSource Florida Administrative Policy #115 Common Exit dated June 9, 2021.

POLICY:

Program performance measures, including four (4) of the six (6) WIOA Primary Indicators of Performance, as defined in CSTB Negotiated Local Level of Performance Requirements Policy #020-

C0063 and TEGL 10-16, Change 1, are associated with the participant's exit; therefore, accurate documentation and reporting of exit dates, as well as the services which impact the participant's exit, is critical.

- A. Reportable Individual** – Reportable individuals register in EF and may access self-service system functionalities and receive information-only services or activities. Reportable individuals are tracked and reported in performance reports but do not impact program performance and may not be used to impose sanctions. Reportable individuals are not considered participants in a program, so they do not exit and are instead closed as never enrolled. The date of closure for reporting purposes is determined as follows:
- a) Individual does not become a participant.
 - b) Individual is served with only self-service and/or information-only services.
 - c) 90 days elapsed since being identified as a reportable individual, and the individual has not received additional self-service or information-only services or activity during the 90-day time frame.

Once the above criteria(s) have been met, the date of closure is applied retroactively to the last day of receipt of self-service and/or information-only services or activities. This methodology is used to ensure reportable individuals do not remain in the system indefinitely.

- B. Participant** – A reportable individual becomes a participant when he/she has met program enrollment requirements for eligibility and received a staff-assisted participating service. The participant date is the date the individual received the first participating service (and is enrolled in the appropriate program). Participating services that establish or extend participation are identified in the [Employ Florida Service Code Guide](#).

Note: WIOA Youth are not considered participants until they have received the following:

- a) *Objective assessment.*
 - b) *Individual Service Strategy (ISS); and*
 - c) *At least one of the 14 Youth Program Elements as described in 20 CFR Part 681.460.*
- C. Extending Participation** - Every recorded participating service provided to a participant, establishes a new exit date and extends participation for 90 days. Self-service, information-only services or activities, and follow-up services do not delay, postpone, or affect the date of exit. 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 the CSTB staff member, vendor or service provider and the participant have exchanged information, or the participant has agreed to the service being provided by staff member. Staff should ensure that direct contact is made at a minimum of every 30 days with the participant to maintain the highest level of individual service. Determined on an individual basis and/or by local operating procedures, more frequent contact may be required. Indirect contact attempts, 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.

Acceptable forms of direct contact include:

- in-person or remote contacts

- Mail
- Telephone
- Email; or
- Other documented means of contact.

Contact should result in a participating service being provided to the participant. Contact where the participant does not engage will not be considered direct and must not result in a participating service being recorded in EF.

An offer to provide a service or a scheduled appointment to provide a service must only be entered as a case note or non-participating service.

D. Participant Transfer - Participants may relocate from one LWDB to another and continue to receive workforce services without interruption. For WIOA Title I and TAA participants. DEO One-Stop and Program Support is responsible for approving the transfer of cases from one LWDB to another in EF.

Prior to the transfer of WIOA Title I or TAA participants in EF, authorized representatives from both LWDBs must agree to the transfer in writing via email. Copies of the emails must be retained in the participants case file receiving LWDBs should ensure they have received any participant files (TAA or WIOA) or documents stored outside of EF prior to the agreement of transfer.

Once the case is transferred, the receiving LWDB will be responsible for ensuring the case file is in good standing and bear responsibility for monitoring issues following the date of accepted transfer. Additionally, they must accept responsibility for the outcomes and performance associated with that participant. The coordination will include, but not be limited to:

- a) Confirmation of reason for transfer to another LWDB (e.g., relocation, customer request);
- b) Email dialogue between LWDBs where customer is enrolled and receiving LWDB prior to transfer;
- c) Review of the participant's case file by the transferring LWDB prior to transfer;
- d) Review of the participant's case file by the receiving LWDB prior to approving transfer;
- e) Discussion and resolution of any identified issues between LWDBs;
- f) If applicable, requesting guidance from DEO via email at WIOA@deo.myflorida.com for customers files and EF services that are not in good standing and cannot be resolved between LWDBs.

NOTE: LWDBs may not decline to accept transferring customers without consulting DEO.

To complete a WIOA Title I or TAA participant transfer, the transferring LWDB must close all open EF activities and plans, and submit the following to PRA@deo.myflorida.com:

- The LWDB and office the participant is being transferred from;
- The LWDB, office and staff member the participant is being transferred to;
- Documentation of the agreed upon transfer from both LWDBs (email); and
- The participant's State ID and Employ Florida Program Application ID.

WP cases do not require transfer, however before providing staff-assisted services, staff must update the participant's Employ Florida Wagner-Peyser Program Application and individual registration to their respective LWDB. NOTE: If staff are making changes to the EF registration, they must follow the CSTB Jobseeker Registration Policy #019-C0017.

E. Case Closure – When staff have determined 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, the participant’s case should be formally closed in EF. This will immediately stop the addition of any other program services and prompt staff to gather any employment data. CSTB has established guidelines requiring case closure if a participant has not received a service in the past 90 days and no successful contact has occurred.

Case closure is a case management feature of EF and should not be confused with a participant exit, which is federally defined and structured. The decision to close the case should be documented accordingly by CSTB staff, vendors, and service providers in case notes. While a participant’s case may be closed because the participant entered employment or education, the participant may not be ready for exit and follow-up services. Ideally, each participant should remain a program participant long enough to be stable in a job or post-secondary education.

Prior to closing a participant’s case, staff must:

- a) Ensure the Individual Employment Plan/ Service Strategy (IEP/SS) Plan has been closed out;
- b) Ensure all service have been closed;
- c) Enter any credential(s) earned during the program, including the type, verification and credential date to the Closure Information tab or Credential Section.
- d) Make sure any Measurable Skill Gains attained during the program have been added to the participant’s Measurable Skill Gains (MSG) ribbon or, individuals below postsecondary education level literacy/ numeracy gains or to the Educational Functioning Level for MSG ribbon; and
- e) Make sure that all supportive service activities have been entered/documentated; and
- f) Add any unsubsidized or On-the-Job Training (OJT) employment entered during the program or at closure to the Add Employment ribbon.
 - *Note: Case closures may be deleted for participants who request or demonstrate a need for continued services if the participant has not exited. For participants who have exited, the case closure may not be deleted if 90 days has lapsed, and a new program application in Employ Florida will be required for the participant. This is a CSTB RSO function managed by our MIS Department.*

F. 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. LWDBs must provide and document WIOA follow-up services in EF unless the participant refuses services. If a participant refuses follow-up services, staff must document the refusal with a case note in EF .

Note: Follow-up services are not required for TAA or WP participants, or any WIOA Title I participant exited due to a global exclusion.

G. Exits – Individuals who are a participant in more than one program covered under the common exit policy will have a single common exit date. The participant’s exit occurs when he/she has:

- a) Not received services for at least 90 calendar days from any program to which the common exit policy applies; and

- b) No future services scheduled, except for self-service, information-only activities, or follow-up services.

The participant's exit date cannot be determined until 90 days have lapsed since the participant last received a recordable service and no services are scheduled for the future. The exit date is applied retroactively to the last service date. There are two types of exits.

1. System (Soft) Exit

Occurs automatically after participants receive no staff-assisted services for 90 days in either WIOA Title I, WP, or TAA programs. Exit will occur automatically based on actual or projected end dates of reported participating services/ activities. For WIOA and TAA, case notes should support the last date of staff-assisted services provided with activity end dates that accurately reflect the actual last service provided.

In some cases, WIOA and/or TAA activities may be completed but the participant continues to receive WP services, which will extend program exit. Exit is often triggered by completion of training, successful transition into employment, or loss of contact. The completion of training and successful transition into employment must be documented in services with corresponding activity end dates. However, if the participant is not engaged in open WIOA activities, loss of contact must only be documented in a case note.

2. Manual (Hard) Exit

Are not allowed unless the participant falls into one of the WIOA Title I global exclusion scenarios. Otherwise, participants must be soft exited from the system to be closed out after 90 days of receiving no staff- assisted services.

Participants may be excluded from the WIOA Primary Indicators of Performance Measures, at the time of closure, for any of the following global exclusions that precludes the participant from entering employment or participating in services:

- a) **Institutionalized:** The participant exits the program because he/ she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center while receiving services as a participant.
- b) **Health/ Medical:** The participant exits the program because of a medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
 - a. If a participant is exited due to a global exclusion and it is due to a medical reason or disability, staff must collect information in a separate file and not disclose in case notes the details pertaining to the reason for exit. The exclusionary/ neutral exit reasons that could disclose medical or disability-related information are:
 - i. Health/ medical issues; and
 - ii. Residing in an institution or facility providing 24-hour support, such as prison or hospital.
- c) **Deceased:** The participant is deceased.
- d) **Reservist called to Active Duty:** The participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty or at least 90 days.
- e) **Foster Care (WIOA Youth Only):** The participant is in the foster care system, as defined in 45 CFR 1355.20(a) and exits the program because the participant has

moved from the local workforce development area as part of such a program or system.

LWDB staff should submit requests to create a manual closure through global exclusion in writing to the Program Director or an individual designated by LWDB as the approving authority for global exclusions. Staff must state the reason for the request and provide the name and EF state ID number of the participant in order to receive approval from the approving authority to create a closure and exclusion.

If the approval to create the closure and exclusion is granted, then the requesting staff member is solely responsible for ensuring that all the necessary and required documentation has been secured and uploaded to CSTB EDMS system (ATLAS) for verification purposes.

H. Mismanagement of Exits

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 in EF that the participant has unmet needs and is actively being served. Additionally, Employ Florida service codes that are not training or work experience services must 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 actions do not constitute a service nor direct contact with a participant for the purpose of extending participation:

- a) Leaving voicemail messages for the participant;
- b) Speaking with relatives of the participant who are not the participant's guardians(s);
- c) Scheduled services or an offer to provide services;
- d) Sending flyers, letters or postcards;
- e) Speaking with the participant's parole officer;
- f) Casual, unscheduled conversations with the participant in public;
- g) 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 IEP; and
- h) 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 IEP.

Monitoring

CSTB will conduct programmatic monitoring throughout the program year through our internal Program Monitor(s) under the direction of our Chief Policy & Performance Officer. This will include a formal review of services and closures to ensure compliance with federal, state, and local policies and procedures.

References

- CareerSource Florida Administrative Policy #115 Common Exit: [adminpol115_wioa-wp-taa_commonexit---final-06092021.pdf \(floridajobs.org\)](#)
- 20 Code of Federal Regulations (CFR) Part 677: [Electronic Code of Federal Regulations \(eCFR\)](#)

- TEGL 10-16, Change 1: [TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 10-16, Change 1, Employment & Training Administration \(ETA\) - U.S. Department of Labor \(doleta.gov\)](#)
- TEGL 14-18: [TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 14-18, Employment & Training Administration \(ETA\) - U.S. Department of Labor \(doleta.gov\)](#)
- TEGL 19-16: [TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 19-16, Employment & Training Administration \(ETA\) - U.S. Department of Labor \(doleta.gov\)](#)
- TEGL 21-16: [TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 21-16, Employment & Training Administration \(ETA\) - U.S. Department of Labor \(doleta.gov\)](#)

INQUIRIES: Any questions about policy should be directed to the Chief Policy & Performance Officer, Director of MIS & Data Services and/or their designee.