

SNAPSHOT

Subject:	Guidance on Data Integrity and the Customer Participation Cycle for WIOA Title I and TAA Programs
Policy Number:	ADWDB-XX-2019

ALL WIOA AND NOVEMBER 2018 CDLE PGL REVISIONS ARE YELLOW HIGHLIGHTED

BACKGROUND

Section 166 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and Local Areas in achieving positive outcomes for individuals served by the workforce development system's six (6) core programs, which are the Adult, Youth, Dislocated Worker, Wagner-Peyser Employment Service, Adult Education, and Vocational Rehabilitation programs. WIOA provides a historic opportunity to align performance definitions, streamline performance indicators and ensure comparable data collection and reporting across all six of these programs, while also implementing program-specific requirements.

Specifically, this policy addresses the participation cycle and follow-up requirements for the WIOA Title I and Trade Adjustment Assistance (TAA) programs, which relate directly to performance outcomes.

Arapahoe/Douglas Works! (ADW!) has reviewed and revised pertinent local policies and procedures to align with the corresponding PGL which include the following topics:

- Guidance that defines the term **Participation Cycle** as the period that begins when an **Eligible Applicant** receives the first **Participation Service** and ends on the date the Participant receives the last Participation Service, and includes all definitions addressed in section IV.A.1. of this policy;
- Guidance that identifies the criteria to distinguish participation services from those that are non-participation services, such as caseload management/administrative activities. Include the procedure for recording the AD caseload management/administrative service code, and the requirement that a case note must be included with each recorded participation service.
- Procedures for providing follow-up services to, and contacts with, Program exiters that include definitions of these terms and specifies the timing and frequency of follow-up.
- Definitions of follow-up services that may align with the state definitions or may further restrict which follow-up services may be provided. This guidance must include any limits on costs, and procedures to record follow-up services in the case file, which include the requirement that a case note be entered for each follow-up service.
- Guidance that incorporates the changes and updates to the Connecting Colorado system and resulting procedural changes that are covered in this policy.
- Policy and guidance that establishes, as the minimum, the standard for timely data entry as set (14 days).

DEFINITIONS

Reportable Individual: A reportable individual is an applicant who receives only self-service or information only services and is not counted for performance for WIOA Title I, TAA or Wagner-Peyser. These individuals are automatically assigned the ES Wagner-Peyser program code by Connecting Colorado. Enrollment in other than the Wagner-Peyser program requires data entry of the program code into Connecting Colorado.

SERVICE PROVISION

Each participation service requires a case note (confidential or ES case note, as appropriate) that includes a description of the service provided. This requirement applies to each participation service provided by every program (and its Connecting Colorado agent) in which the customer is co-enrolled.

EXITS

Extending Program Enrollment

With the exception of supportive services, self-service, information-only services or activities, follow-up services, administrative services, and locally defined services, every service provided to a Participant (including supportive services for Youth/Young Adult only), once recorded, establishes a new exit date.

Gap in Service

A gap in service prevents an unintended exit from occurring and may be utilized by the WFS in one of three allowable circumstances:

- i. Delay before the beginning of training;
- ii. Health/medical condition or providing care for a family member with a health/medical condition;
- iii. Temporary move from the area that results in temporary discontinuance of services, including National Guard or other related military service.

FOLLOW-UP FOR WIOA TITLE I ADULT/DISLOCATED WORKER EXITERS

- Follow-up services for adults and dislocated workers are designed to ensure job retention, wage gains and career progress but do **not** count as **participation services** and do **not** extend the participation period.
- Supportive services also may not be used to extend the date of exit for performance accountability purposes for Adult or Dislocated Worker. Supportive services, like follow-up services, do not make an Adult or Dislocated Worker a participant or extend participation.

FOLLOW-UP FOR WIOA TITLE I YOUTH/YOUNG ADULT EXITERS

- The final rule also states that follow-up services for Youth/Young Adult also may include only the following youth program elements:
 - i. supportive services;
 - ii. adult mentoring;
 - iii. financial literacy education;
 - iv. services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
 - v. activities that help Youth/Young Adult prepare for and transition to postsecondary education and training.

Only the Arapahoe/Douglas Works! Division Manager may grant exceptions to provisions within this policy.