



Category/Subject: Cleanup of WIA Exit Data
Colorado Policy Guidance Letter#: MIS-2011-01 (prior #11-11-WIA)
Revise/Replace PGL#: N/A
Date: August 16, 2011
Distribution: CDLE Management/Finance, State/Local Workforce Directors & Staff, Partners

- I. **REFERENCE(S):** Title I of the Workforce Investment Act (WIA) of 1998; WIA Final Rules - 20 CFR Part 652, et al., published at 65 Fed. Reg. 49294 (August 11, 2000); USDOL Training and Employment Guidance Letter (TEGL) #17-05: Common Measures Policy for the Employment and Training Administration’s (ETA) Performance Accountability System and Related Performance Issues.
  
- II. **PURPOSE:** To provide guidelines for the required cleanup of exit data for WIA participants carried-in to PY10.
  
- III. **BACKGROUND:** During the period June 21 – July 2, 2010, the US Department of Labor (USDOL) conducted a Program Reporting and Data Validation Review of Colorado’s Workforce Investment Act activities and programs. A final report of this Review was issued by USDOL on November 23, 2010. Colorado was found to be out of compliance for failing to implement the requirements stipulated in TEGL 17-05 for reporting *point of exit*. As part of the state’s response to the report, CDLE is developing policy and training on program exits for WIA participants, and requiring the cleanup of exit data not complying with the TEGL.
  
- IV. **POLICY/ACTION:** In an effort to report participant exit data as accurately as possible, CDLE is mandating a cleanup of records at the local level for WIA participants (inclusive of all formula and ARRA-funded Adults, Dislocated Workers, and Youth) whose program registrations were carried-in to PY10 incorrectly because a 90-day service lapse at some point during their period of participation should have triggered a “soft” exit prior to 7/1/2010. To facilitate this cleanup, CDLE will allow for a temporary, one-time reopening of the Connecting Colorado database during which users with MIS-level access will be able to terminate registrations during the otherwise locked 10/1/2009-6/30/2010 date range.  
 Data from before 10/1/2009 cannot be changed. The following procedures shall be followed by each local region in accordance with this guidance:
  1. In consultation with local case management staff, local MIS coordinators shall identify WIA participants whose program registrations were carried-in to PY10, but should not have been, because a 90-day service lapse at some point during their period of participation should have triggered a “soft” exit prior to 7/1/2010.
  
  2. For participants identified as meeting the above criteria, local staff shall determine what the correct exit date should be, in accordance with USDOL guidance on reporting the point of exit (TEGL #17-05, Section 6(B) (pg 20-22), *Point of Exit for Common Measures Reporting*).

3. **From 8/8/2011 to 8/19/2011**, CDLE will unlock the 10/1/2009-6/30/2010 date range in Connecting Colorado for the singular purpose of allowing local MIS coordinators to store the correct termination date for identified participants. A case note corresponding to the exit date should document the provision of the last service before the 90-day service lapse.

4. If it is determined that the correct exit date for identified participants is before 10/1/2009, those participants should be terminated with a 10/1/2009 exit date. (Data from before 10/1/2009 cannot be changed.) The following case note should be entered: "Participant should have been exited prior to 10/1/2009. Reporting exit date on 10/1/2009 per state-directed exit cleanup procedures."

5. **Each local region shall submit a list of the masked social security numbers (MSK) of identified participants whose records are being changed as part of the required exit cleanup to the Program Monitor lead for their region by no later than Friday, September 2, 2011.** Regions will be monitored for compliance with this guidance.

V. **IMPLEMENTATION DATE:** August 8, 2011.

VI. **INQUIRIES:**

Please direct all inquiries to Larry Lemmons ([larry.lemmons@state.co.us](mailto:larry.lemmons@state.co.us)) at Workforce Development Programs.

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