



Category/Subject:	Guidance on Data Integrity and the Customer Participation Cycle for WIA and TAA Programs
Colorado Policy Guidance Letter#:	MIS-2012-01 (prior #12-06-WIA)
Revise/Replace PGL#:	12-06-WIA
Date:	March 25, 2015
Distribution:	CDLE Management/Finance, State/Local Workforce Directors & Staff, Partners

**REVISIONS YELLOW HIGHLIGHTED**

**I. REFERENCE(S):** Public Law 105-220 *Workforce Investment Act of 1998*; Public Law 107-210 *Trade Act of 2002, Sections 114 and 115*; ETA Training and Guidance Letter (TEGL) 11-02 *Operating Instructions for Implementing the...Trade Act of 2002, including Change 3*; TEGL 17-05 *Common Measures Policy for the Employment and Training Administration’s Performance Accountability System and Related Performance Issues*; TEGL 22-08 *Operating Instructions for Implementing the Trade and Globalization Adjustment Assistance Act of 2009, including Change 1*; TEGL 27-10 *Program Year 2010/Fiscal Year 2010 Performance Reporting and Data Validation Timelines*; TEGL 24-10 *Data Element Validation for TAA*; *Colorado One-Stop System Policy Guidance Letter (PGL) 10-14-TRA Guidance on the Issuance, Renewal and Revocation of Waivers for TRA purposes*; PGL TAA-2010-01 *Guidance on Providing and Documenting Case Management Services to TAA Participants*; PGL 10-17-WIA *PY09 Data Validation Procedures*; PGL ADM-2001-01 *Monitoring-WIA, Title I*; Technical Assistance Notice (TAN) 06-3 (Revision #3) *Avoiding Data Element Validation Errors*

**II. PURPOSE**

- A. To provide uniform guidance for Workforce Regions that ensures compliance with the participation, enrollment, and exit requirements prescribed in TEGL 17-05: Common Measures Policy for the Employment and Training Administration’s Performance Accountability System and Related Performance Issues,
- B. To provide procedural guidance for the documentation and data entry of Program enrollments, services, and exits that will ensure accurate and reliable data for compliance with the Data Validation requirements of TEGLs 27-10, Change 1, and 24-10, and
- C. To inform regions of the requirement to write and submit (and/or update) local policies and implementation procedures and methods for maintaining data integrity
- D. To revise and expand PGL 11-17-WIA. Changes have occurred throughout the PGL and attachments; therefore regions should carefully review the total document and establish local policies and procedures on the basis of this new guidance.

**III. BACKGROUND:** In June 2010, the Regional Office of the Employment and Training Administration conducted a comprehensive review of the State of Colorado's compliance with program reporting and data validation requirements for WIA (Workforce Investment Act), TAA (Trade Adjustment Assistance Act), and public labor exchange activities and programs. The Federal Reviewer’s exit report, issued in August, cited the requirement that States must adhere to federal policies and procedural guidance regarding data validation across the core workforce programs, including appropriate user guides and handbooks, and “ensure that local areas and

offices follow suit where local policies, operations and procedural protocols impact the reliability and accuracy of State-reported data...” To meet these requirements, CDLE agreed to issue a comprehensive policy (PGL) and deliver statewide training incorporating guidance from:

TEGL 17-05: provides guidance on common measures policy for ETA workforce programs and clarifies reporting requirements for the WIA, Wagner-Peyser Act, Veterans' Employment and Training Service, and Trade Adjustment Assistance programs. Additional guidance clarifies the points at which program participation commences and terminates.

PGL 01-09-WIA1: directs the Workforce Regions to “develop internal and subrecipient monitoring policies and procedures (and)...monitor internal and subrecipient systems for compliance with the WIA federal and state requirements.”

TAN 06-3 (Revision #3) updates the WIA data element validation protocols to align with source documentation requirements in TEGL 31-09.

#### IV. POLICY/ACTION:

##### A. The Participation Cycle, Case Management, Service Provision, Exits, and Follow-up:

Program performance measures are keyed to the participation cycle, therefore, accurate documentation and data entry of enrollment and exit dates, as well as reportable services and follow-up services into the Connecting Colorado database, are critical. The following sections define the requirements for each of these elements.

##### 1. The Participation Cycle

For the purpose of this guidance, the *participation cycle* is the period that begins on the *participation date* and ends on the *exit date*, where:

- a. The *participation date* is the date an eligible Applicant receives the *first participation service* (and is enrolled as a Program Participant). As used in this guidance, the terms *enrollment date* and *registration date* are interchangeable with *participation date*.
- b. A *participation service* is a Program-funded service provided to an eligible Applicant. Included are core, intensive and training services that are provided by WIA program-funded staff and specific assessment and training services provided concurrent with approval of TAA-funded benefits. On the date the *first participation service* is provided, an eligible Applicant is enrolled in the appropriate Program. This guidance includes a categorized table of services commonly provided to Applicants and Participants (see attachment A.19)
- c. A *Participant* is an eligible Applicant who has received at least one *participation service* on or after the date the Applicant was determined eligible.

The term *participation period* refers to the duration of *participation cycle*.

##### 2. Case Management

*Case Management* is defined in WIA Sec. 101(5) as a client-centered approach in the delivery of services designed, for instance, to prepare and coordinate comprehensive employment plans to enable participants to access needed activities and services. Therefore, by its very nature, “case management” includes administrative functions such as regular contact with training providers, an employer or the participant to assess training progress, employment status, or the need for additional services, respectively. Caseload management functions such as contacts with service providers, paying invoices, contacts with former participants to update employment status or to secure documentation, and activities such as data entry are certainly *part* of case management but they are administrative in nature and are not considered a service that would commence participation or extend exit according to USDOL policy guidance. These functions are appropriately recorded as *local administrative services* (AD), and they will have no effect on the participation period. See Section 5.d for an explanation of the AD service code.

### 3. Service Provision

It is essential to the integrity of participant data that services entered into the record reflect services actually provided to the Participant and that all activities involving a participant are correctly identified and accurately recorded in the participant's Connecting Colorado record. In addition, whether or not the service was anticipated in the Individual Employment Plan or Individual Service Strategy, there should be a clear indication in a case note that the service will aid in the attainment of a goal(s) specified in the IEP or ISS. In other words, **each participation service requires a case note that includes a description of the service provided.** There are instances, however, where participants may access self-services during their participation cycle. In these instances, a case note is not required. For instance, *Self-Directed Job Search* (SJ) is a participation service where a corresponding case note would not be necessary. The codes for some of these services cannot be manually entered. Therefore, the case manager should become aware of the participant's self-service (or non-assisted) activities by reviewing participant services or being in contact with the participant on a regular basis.

### 4. Exit and Extending Enrollment

An *Exiter* is a Participant who has not received a service for 90 consecutive calendar days, has no gap in service, and is not scheduled for future services.

- a. **Exit Defined:** The term exit means a Participant has not received a service for 90 consecutive calendar days, has no gap in service, and is not scheduled for future services. The *exit date* is the date of the last recorded service provided to the Participant.
- b. **Co-enrolled Exiters:** A co-enrolled participant cannot be exited until participation has been completed for all of the programs in which the participant is enrolled. This is consistent with USDOL's requirement that – at a minimum – there be a common exit date across WIA, TAA and Labor Exchange programs. The exception to this rule is the case of exit in a discretionary grant other than a National Emergency Grant. (Exit in a single discretionary grant program can occur when participation in that grant has been completed or the grant expires. The procedure is illustrated in Attachment A.15.)
- c. **Extending Program Enrollment:** With the exception of follow-up, *local administrative* (AD) *services*, *job event notices* (JE service) and locally defined services, every service provided to a Participant, once recorded, establishes a new exit date. The service may be staff-assisted—not necessarily by a Case Manager—or self-service, either on-line, or on-site at the One-stop (e.g.: CL—*Self-Service Computer Lab*). It is expected that, in the course of reviewing the Connecting Colorado Caseload Report, the Case Manager will attempt to contact a Participant who appears to have become inactive to determine the Participant's status. If the contact results in the delivery of a participation service, the service and a case note must be recorded. An offer to provide a service or a scheduled appointment to provide a service must not be recorded as a participation service, although the contact and the results should be entered as an *administrative* service and appropriately documented. Program participation is only extended when a qualifying participation service is provided to a Participant and recorded, or when an allowable gap in service is recorded in Connecting Colorado.
- d. **Gap in Service:** A gap in service prevents an unintended exit from occurring and may be utilized by the Case Manager in one of three allowable circumstances. The duration of the *gap in service* (PG service) cannot exceed 180 days, and the Case Manager must document one of the following circumstances in addition to the participant's intent to continue services once the issue prompting the gap in service has been resolved.
  - Delay before the beginning of training;

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

The Case Manager's **case notes** must refer to physical documents as well as notes from the interview with the Participant specifying the reason for the gap and the Participant's intent to complete the agreed-upon IEP/ISS. The Case Manager may approve continued suspension of services for an additional period of up to 180 days to address unforeseen circumstances that arise during the first gap in service. A Participant cannot exit prior to the actual end date of a PG service.

## 5. Follow-up Services and Follow-up Contacts

- Distinguishing Between Follow-up Services and Follow-up Contacts:** The provision of follow up *services* represents value-added from the participant's perspective, whereas the *activity* of following up with the participant through telephone, letter or e-mail contact represents value-added from the local center's perspective. Both are necessary. However, although regular contacts between local staff and current and former participants are necessary, this is an administrative function necessary to support case management and should not be considered a service that supports the individual's service plan and their attainment of specified goals.
- Follow-up for WIA Adult/Dislocated Worker Exiters:** The regulation at 20CFR663.150 states: "Follow-up services must be made available, as appropriate, for a minimum of 12 months following the first day of employment, to WIA Adult/Dislocated Worker Participants who are placed in unsubsidized employment." 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. Also note that, while follow-up services must be made *available*, not every adult and dislocated worker will want or need such services. Whether or not the adult or dislocated worker exiter receives follow-up services, the Case Manager is expected to contact, or attempt to contact, the Participant who was employed at exit at least once in the 12-month period following the exit date.
- Follow-up for WIA Youth Exiters:** All WIA Youth Exiters must receive some form of follow-up *services* for a minimum duration of 12 months after exit. This is to be distinguished from regular and expected *contacts* with youth post-exit.
- Follow-up for Co-enrolled TAA Exiters:** An employed TAA exiter who is co-enrolled in a WIA Program must be contacted post-exit according to the instructions in paragraph 5.b, above. Otherwise, follow-up contacts and services to TAA Participants are optional. Case Managers should note, however, that these services and activities might have a direct and positive impact on the employment retention and wage gains of Participants who enter employment.
- Follow-up Codes:**
  - **FN Activity Code:** A *follow-up activity code*, **FN** is added to the **Applicant Store Service Menu** screen for Case Managers to utilize when recording a follow-up *contact*, which does not have to be with the former participant (e.g., could include contact with a family member or the employer).
  - **Related Activity Field and the FL Code:** A new field has been added to the **Applicant Store Service** data entry screen. By entering **FL** in the **Related Activity** field, the Case Manager identifies a follow-up service rather than a participation service. In so doing, the Case Manager prevents the reactivation and extension of the exiter's Program enrollment. For data entry instructions, refer to Attachment A.14.

- f. **Local policy may require more frequent follow-up:** This guidance does not supplant local policies. Local procedures can require follow-up contacts and/or services to all partner program exiters beyond the minimum requirements of this PGL.

**6. Connecting Colorado Changes** (currently in effect)

- a. Service code **MS** (*miscellaneous service*) no longer appears on the **Applicant Service Store Menu**. As defined, this service was a legitimate *participation service*; however, it was routinely misused to mark a caseload management/administrative activity, such as an attempt to reach the participant by phone.
- b. Service code **EX** (*exit service*), no longer appears on the **Applicant Service Store Menu**. When used correctly, the *exit service* would normally be the last *participation service*; however, EX was commonly misused instead to mark an event, such as the date the Participant obtained employment.
- c. **FL** is eliminated as a service code. Instead, FL is a data entry option in a new **Related Activity** field on the **Applicant Store Services** screen, which is to be used when the Case Manager (or appropriate provider) provides post-exit follow-up *services*.
- d. A new *caseload management/administrative* (**AD**) code is added, which the Case Manager records to identify a non-service activity, as described in 2.b, above. The data entry procedure is the same as for a *participation service*, except that the Case Manager must record either a **case note** or an entry in the **Comment** field. Review attachment A for additional instructions. Storing an AD service will neither initiate nor extend a participation period.
- e. The system-generated **JE** (*job event notification*) service no longer extends the participation period.

**7. Connecting Colorado Changes** (effective July 1, 2012)

- a. Program *Exit Date*:
  - On the 90<sup>th</sup> day following the date of the last service provided to a participant, a “notice of termination” generated by the system will inform the Case Manager that the Participant is terminated from all open programs as of the date of the last service. During the ensuing 14-day period, the Case Manager is allowed to complete or update all fields on the **Store Termination** screen. On the 14<sup>th</sup> day following the “notice” date, the system will auto-fill and lock the *Date* field. All of the other fields on the **Store Termination** screen will remain open for editing. Review attachment A.10.
  - As noted in 4.b, above, the exception is the case of exit in a discretionary grant other than a National Emergency Grant.
- b. Recording multi-day training and training-related services:
  - The *Start* date and *Estimated Completion* date are required data entry.
  - Beginning on the *Estimated Completion* date, the system will generate a daily notice advising the Case Manager that the service will be terminated effective the *Estimated Completion* date. During the ensuing 14 days, the Case Manager may update any field on the **Applicant Service Store** screen, including the service *End* date.
  - On the 14<sup>th</sup> day following the *Estimated Completion* date, the system will auto-fill the service *End* date (same as *Estimated Completion*). After the 14<sup>th</sup> day, all fields on the **Applicant Service Store** screen will remain open for editing except the service *End* date. Review attachment A.11.
- c. The system will generate an error message and not allow the *Start* date of a service to be more than 14 calendar days prior to the date the service is recorded. Exempted are AD services, L#, M# (locally defined) services and LN (Literacy/Numeracy) pre-test.

## 8. Timely and Accurate Data Entry

Ideally, Case Managers will record a service immediately on the date the service is provided. The advantages of this practice are evident: the Case Manager, other One-Stop office staff, the clients and Program monitors all gain the benefits of accurate recording and timely data availability. While this is a logical standard for timeliness of data entry, adherence is not always practical or feasible. To avoid undue delays and any negative impact on data integrity and quality of service, this guidance establishes the following standards:

- a. The maximum interval allowed between the date a service is provided (or begun) and the date the service is recorded is 14 calendar days. Although this is system-enforced, Regions are urged to establish proactive procedures designed to assure compliance with this policy
- b. Recording a date of service (*Start* date) other than the date the service was actually provided (or begun) is prohibited.

### B. Development of Local Policies and Procedures: One-Stop Regions are required to review and revise pertinent internal policies and procedures to align with this PGL and to include the following topics:

1. 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 definitions of each of these terms.
2. Guidance that identifies the criteria to distinguish participation services from those that are 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.
3. 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.
4. Guidance that incorporates the changes and updates to the Connecting Colorado system and resulting procedural changes that are covered in this PGL
5. Policy and guidance that establishes, as the minimum, the standard for timely data entry as set forth in this PGL (14 days).

In addition, local internal monitoring policies and procedures should include the review of case files for all items related to the Participation Cycle, exits, and follow-up services. Regions are required to submit policy and procedure revisions to CDLE monitors for review not later than June 30, 2012.

### C. Additional Responsibilities: Regions are expected to:

1. Ensure that Case Managers are trained in and are correctly executing the instructions in Attachment A: *Procedures for Enrolling and Exiting TAA/WIA Participants and Recording participant/Applicant Services.*
2. Direct Case Managers and others who conduct internal monitoring to review Applicant and Participant files to ensure that they contain the documents required for the purpose of data validation, as specified in TAN 06-3 and in Attachment B: *WIA Data Validation Desk Aids-Documentation Requirement.*

### D. Case Files: Regions are encouraged to:

1. Set standards for the organization of documents within physical and electronic (scanned) Participants' files. This includes monitoring discretionary grants, along with Wagner Peyser job seekers and employer job orders for similar standards.
2. Utilize digital scanning of case files. Attachment C is a review of the electronic document Management system available in Connecting Colorado.

**V. IMPLEMENTATION DATE:** July 01, 2012, where noted; otherwise, immediately upon release of this letter.

**VI. INQUIRIES:** Direct inquiries to your Regional Liaison at Workforce Development Programs.

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**ATTACHMENTS**

**Attachment A: Procedures for Enrolling and Exiting TAA/WIA Participants and Recording Participant/Applicant Services**

Attachment B: WIA Data Validation Desk Aids-Documentation Requirements

Attachment C: Electronic Document Management