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Purpose: To provide policy for the understanding Exit Dates

References: WIOA, NPRM 681.450 DWD Memorandum on Interim Guidance on Participation and Exit dates and TEGL 17-05

Case Closures

When a participant no longer requires services and case management 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. Case closure is a case management process and is not terminology used in the WIOA law. Case closure should not be confused with Exit, which is federally defined and structured. The decision to close the case should be documented accordingly in the 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 youth should remain a program participant long enough to be stable in a job or post-secondary education.

Exits

When to formally close a case - A good rule of thumb is that youth can be considered stable if they continue to be successful after 6-8 weeks on the job or the second quarter or semester in post-secondary education or advanced training.

Participants should be notified that their cases are being transitioned and for what reason, along with information on the type and frequency of follow-up contact to expect. The term 'exit' is not mandatory and may be found abrasive. Instead, you may wish to explain to the youth that they are transitioning to another phase of service where they will become more and more independent, but that you are still there to help them if they need it and will be in contact.

A case note should be made indicating the formal closure of the case and the reason, i.e., no longer in need of, or able to benefit from services, lack of participation, or customer requested exit.

A participant will automatically exit the program when they have not received the WIOA services for 90 consecutive days. The exit date is the last date of service with no other services planned. The only way to prevent a system exit is to provide a service before the 90th day after the last service. This service **must** be appropriate for the participant.

Once a participant has not received any services funded by the program, or a partner program, for 90 consecutive calendar days, has no gap in service, and is not scheduled for future services*, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program.

- Examples of activities that do not extend the period of participation, or delay program exit, include:
- Follow-up services which may include:
    o Additional career planning and counseling
    o Assistance with work-related problems that may arise
    o Peer support groups
    o Information about additional educational opportunities
    o Informational mailings and

- o Referral to supportive services available in the community
- Monthly Check-Ins (Non-TAA)
- Determination of eligibility to participate in the program
- Administrative case load management services that involve contact with the customer to obtain information such as employment status or educational progress
- Income maintenance or support payments such as Unemployment Insurance, TANF, Food Stamps, unsubsidized childcare, etc.

The Exit date is a critical data validation item. If the Exit date is not accurate, not only will this item fail but all other data items related to the exit date may fail.

Note – the phrase 'not scheduled for future services" does not apply to an individual who voluntarily withdraws or drops out of the program.

See additional Exit Date Guidance attachment A

Attachment A

Exit Dates and Data Validation - Regional Guidance

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<u>To validate the exit date, there must be a MATCH by:</u>
1. Documentation of services in case file or case notes.
2. State Case Management System -paper or scanned documentation is not required. However, detailed information must be present in the case management system sufficient to validate the data item.

For a Service in Track One to be 'counted' as a service verified for the Exit date, **a case note must be attached.** If there is not a case note attached to the last service, the exit date will fail as it not verified. Also the Planned End date and/or the Actual End date may impact the exit (if no other services are provided beyond the Planned or Actual End dates. When a Planned End date has been entered, an Actual end date should then be entered when the service is exited/completed and a case note must be entered. If you become aware on June 5th that the customer completed the training on May 22nd enter the Actual End date of May 22nd and post your case note on June 5th stating the training was completed on May 22nd. The date stated in the case note must MATCH the end date.

Please ensure actual end dates are entered when a planned end date had been entered and that there is a case note attached for each service and the Actual End date.

If there is a planned or actual end date after a 'last' service and there is not a case note for the planned or actual end date, the exit date is incorrect.

Examples:
Example 1

The last service posted in Track One on 1/15/2014 is 1-1 counseling service, but no case note.

If the last service provided to a customer in on 1/15/2014, but no case note is entered. The service is not verifiable, therefore it cannot be considered the 'last service' and the exit date fails data validation. ***Every WIOA service must have a case note attached***

Notes: The WIOA Monthly Check-In is not considered a countable service and does not start or end a POP. So the Monthly Check In is not considered in the Exit date calculations.
Example 2

Planned End date is past the last posted Service in Track One

The last service posted in Track One is 1-1 Counseling provided on December 29, 2013 and case note reflects customer is attending and doing well in training.

Planned end date is March 15, 2014 and the training plan shows class to end 03/15/2014 90 days have passed and the Exit date is recorded as 03/15/2014 as Track One uses Planned end date as the 'last' service.   However, the Exit date will fail as <u>no case note</u> reflecting a service actually occurred on 03/15/2014. Any other performance elements such as entered employment and average earnings which are calculated by the Exit date will fail as well in this scenario as the 'verified service' by case note exit date (12/29/13) is in a different quarter. If staff had entered a case note on March 15th verifying the customer was still in class or had changed this to an actual end date – (when we can verify the customer completed training until March 15th) and entered a case note this would meet validation standards.

A January check in with the customer should have occurred and indicated if the customer was still attending class. If the customer can no longer be reached, then verification with the training vendor of when the customer last attended class should occur, the actual end date entered, and case note reflecting why. If the training vendor cannot provide then the Actual End should be when you could last verify the last date of attendance, which in this case is December 29, 2013.

Note:
If the Actual End Date turns out to be a different date than the Planned End Date, then the Planned End Date should be modified to match the Actual End Date. Also, if the Planned End Date has passed but the customer is still participating in the service, the Planned End Date needs to be extended.