

**COMPILED RESPONSES TO
ADMINISTRATIVE POLICY:
COMMON EXIT**

Policy Section	Issue(s)	Submitted by (Name/LWDB)	Policy Language Change	DEO Response	Authority
IV. G.1	It says loss of contact can only be documented in a case note. If you are closing the case because the customer has cut all contact, you would still have to close any open activities with end dates, correct?	Donna Doubleday, LWDB 6	Yes	The policy has been updated.	WIOA, Section 116 TEGL 10-16, Change 1
IV. B	This section lists three services that a Youth must receive to be considered a participant. There are multiple codes associated with the 14 Youth Program Elements; which specific codes will DEO be looking for?	Jennifer German LWDB 4	No	The question is outside the scope of the policy. DEO has taken this question under advisement for consideration during future policy development.	N/A
IV.C	The first sentence in this section states that “every participating service provided to a participant ...extends participation for 90 days.” Some services will run for more than 90 days before they are complete – for example, most classroom training will last longer than 90 days. The more often data entry has to be done the more likely errors in data entry will occur. Traditionally when enrolling a client into Classroom		No	All service codes, including training, once closed and recorded extend participants for 90 days. This is a business rule in Employ Florida that can not be changed. However, Section IV.H of the policy states “...Employ Florida service codes that are not training or work experience services must not be future dated to extend participation.” Meaning, staff may leave these service codes open throughout the duration of the training or work experience activity.	WIOA, Section 116 TEGL 10-16, Change 1

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	<p>Training (Occupational Skills Training, code 300) the Career Manager enters a projected end date of 2 years from the start date. It would be more efficient and practical to make certain codes exempt from the 90-day cutoff as long as the 30 day direct contact is made and documented.</p>				
IV.G.2	<p>This section includes a requirement that staff submit requests to “the LWDB’s Data Integrity Specialist” or other staff with authority to close with a global exclusion. The directive on this process in these two paragraphs gets into telling LWDBs how to operate programs. I suggest something simpler: “Staff should be prepared to justify to supervisor(s) the legitimate reason for a global exclusion exit.” Not all boards are arranged in the same fashion due to funding and operational efficiencies. There is no requirement in rule or law that the proposed specific process be followed.</p>		No	<p>This section is intended to preserve system data integrity by preventing access to hard exits at the service-provider level, or at minimum, requiring a review process. The policy does not tell the LWDBs who they may assign as Data Integrity Specialists, nor does it determine how many of these individuals may be assigned.</p>	TEGL 23-19

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<p>IV.H.(g) (h)</p>	<p>Having participants bring in time sheets and/or contacting them to obtain employment status/educational progress etc ARE examples of Direct Contact and should count as such. These are case management tasks where the Career Manager directly interacts with the participant. Rejection of these tasks as “direct contact” seems counter intuitive to those who actually operate programs. Most Career Managers would consider these “tasks” as events that provide meaningful guidance. When a participant brings in their attendance/time sheets, or their employment status forms it is the perfect opportunity to discuss their progress and issues or concerns they are having with their activities.</p>		<p>No</p>	<p>TEGL 10-16 Change 1, Attachment 7, Tables A and B outline the service levels for activity codes. The collection of time sheets or employment information are not services which may extend participation, per this guidance. If the staff member provides meaningful guidance or assistance while collecting the time sheets, that specific service activity should be properly recorded.</p>	<p>TEGL 10-16, Change 1</p>
<p>IV.I</p>	<p>It would seem appropriate that the state update its own monitoring tool which is used broadly by all LWDB’s. It appears that LWDBs are being asked to create a monitoring procedure for every piece of</p>		<p>No</p>	<p>The State updates the monitoring tool on an annual basis. LWDBs are required to establish local, independent monitoring as per the grantee-sub-grantee agreement.</p>	<p>Grantee-sub-grantee agreement</p>

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	individual programs. That would be duplicative; this, like other components of programs would be rolled into our regular monitoring policy and monitoring visits which largely depend upon using the state’s monitoring tool for compliance.				
N/A	During one of the DEO conference calls, Steven mentioned that there were activity codes that could remain open for WIOA cases such as training activities. We recommend those be listed in the policy.	Kimberly Bryant LWDB 22	No	This will be a feature of the revised Employ Florida Service Code Guide. Additionally, these activities will be system set, meaning staff will not be able to extend activities which do not meet the definition of training or work experience.	TEGL 10-16, Change 1
IV.C	Would we be allowed to have work experience activities remain open for the duration of the work assignment?		Yes	The policy language has been updated.	
N/A	In the linked Employ Florida Service Code Guide, the definition for activity code 202 – Career Guidance/Planning states, “the ongoing delivery of services”. We are unclear of the duration of this activity, must it be entered monthly or can it remain open until the customer no longer requires Career Guidance?		No	The Employ Florida Service Code Guide is undergoing major revisions and will include updated definitions which align with the Common Exit policy. In the interim, LWDBs should adhere to guidance issued through this administrative policy which requires all non-training or non-work experience activities be closed on the same day as they are recorded.	TEGL 10-16, Change 1

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