



**POLICY
NUMBER
115**

Administrative Policy

Title:	Common Exit
Programs:	Workforce Innovation and Opportunity Act, Wagner-Peyser and Trade Adjustment Assistance
Effective:	June 9, 2021

I. PURPOSE AND SCOPE

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) the minimum requirements for the common exit of program participants for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP) and Trade Adjustment Assistance (TAA) programs, and procedural guidance for the associated processes.

II. BACKGROUND

WIOA establishes performance accountability indicators, aligns performance-related definitions, ensures comparable data collection, and integrates performance reporting requirements to assess the effectiveness of states in achieving positive outcomes for individuals served by the workforce development system.

In accordance with [Training and Employment Guidance Letter \(TEGL\) 10-16, Change 1](#), states are encouraged to implement a common exit policy. Common exit is intended to ensure a more efficient and effective integrated service delivery system, track the coordination of services, and align performance reporting.

III. AUTHORITY

[20 Code of Federal Regulations \(CFR\) Part 677](#)

[TEGL 10-16, Change 1](#)

[TEGL 14-18](#)

[TEGL 19-16](#)

[TEGL 21-16](#)

IV. POLICIES AND PROCEDURES

Florida has an established common exit policy implemented through its online case management and labor exchange system, Employ Florida. This policy requires that an individual who is participating in any program covered by the common exit policy will not exit (and be counted in performance) until the individual is no longer being served by any program to which the policy applies.

Florida's common exit policy is applicable to the following programs:

- a) WIOA Title I – Adult, Dislocated Worker, Youth
 - i. National Dislocated Worker Grants (NDWG)
- b) WIOA Title III – Wagner-Peyser
 - i. Jobs for Veterans' State Grant (JVSG)
 - ii. Migrant and Seasonal Farmworkers (MSFW)
- c) Trade Adjustment Assistance

Program performance measures, including four of the six WIOA Primary Indicators of Performance, as defined in [TEGL 10-16, Change 1](#), are associated with the participant's exit; therefore, accurate documentation and reporting of exit dates, as well as the services which impact the participant's exit, is critical.

A. Reportable Individual

Reportable individuals register in Employ Florida and may access self-service system functionalities and receive information-only services or activities. Reportable individuals are tracked and reported in performance reports but do not impact program performance and may not be used to impose sanctions. Reportable individuals are not considered participants in a program, so they do not exit and are instead closed as never enrolled. The date of closure for reporting purposes is determined as follows:

- a) Individual does not become a participant.
- b) Individual is served with only self-service and/or information-only services.
- c) 90 days elapsed since being identified as a reportable individual, and the individual has not received additional self-service or information-only services or activity during the 90-day time frame.

Once the above criteria have been met, the date of closure is applied retroactively to the last day of receipt of self-service and/or information-only services or activities. This methodology is used to ensure reportable individuals do not remain in the system indefinitely.

B. Participant

A reportable individual becomes a participant when he/she has met program enrollment requirements for eligibility and received a staff-assisted participating service. The participation date is the date the individual receives the first participating service (and is enrolled in the appropriate program). Participating services that establish (trigger) or extend participation are identified in the [Employ Florida Service Code Guide](#).

Note: WIOA Youth are not considered participants until they have received the following:

- a) Objective assessment;
- b) Individual Service Strategy (ISS); and
- c) At least one of the 14 Youth Program Elements as described in [20 CFR Part 681.460](#).

C. Extending Participation

Every participating service provided to a participant, once recorded, establishes a new exit date and extends participation for 90 days. Self-service, information-only services or activities, and follow-up services do not delay, postpone or affect the date of exit. The management of participant services includes regular, direct contact with the participant on all aspects of their workforce development needs.

Direct contact is considered to have occurred when the LWDB staff and the participant have exchanged information, or the participant has agreed to the service being provided by LWDB staff. LWDB staff should ensure that direct contact is made at a minimum of every 30 days with the participant to maintain the highest level of individual service. Determined on an individual basis and/or by local operating procedures, more frequent contact may be required. Indirect contact attempts, such as sending workshop flyers or job leads by mail or email or leaving telephone messages without receiving a response, do not constitute direct contact for the purpose of providing a service or keeping an activity open.

Direct contact may be performed in-person or remotely and may be conducted by mail, telephone, email, or other documented means of contact. Such contact should result in a participating service being provided to the participant. Contact where the participant does not engage will not be considered direct and must not result in a participating

service being recorded in Employ Florida. An offer to provide a service or a scheduled appointment to provide a service must only be entered as a case note or non-participating service, as appropriate.

D. Participant Transfer

Participants may relocate from one LWDB to another and continue to receive workforce services without interruption. For WIOA Title I and TAA participants, the Florida Department of Economic Opportunity Bureau of One-Stop and Program Support is responsible for approving the transfer of cases from one LWDB to another in Employ Florida.

Prior to WIOA Title I or TAA participants being transferred in Employ Florida, authorized representatives from both LWDBs must agree to the transfer in writing. This requirement may be met by retaining copies of emails detailing the transfer agreement. Receiving LWDBs should ensure they have received any participant files or documents stored outside of Employ Florida prior to the agreement of transfer.

When a case is transferred from one LWDB to another, the receiving LWDB must accept responsibility for the outcomes and performance associated with that participant. In addition, both LWDBs must maintain documentation on file indicating that the completed transfer was agreed upon. The receiving LWDB will be responsible for ensuring the case file is in good standing and bear responsibility for monitoring issues following the date of accepted transfer. In order to ensure seamless, high quality service to the participant, transfers will require close coordination within the network of LWDBs. The coordination will include, but not be limited to:

- a) Confirmation of reason for transfer to another LWDB (e.g. relocation, customer request);
- b) Dialogue between LWDBs where customer is enrolled and receiving LWDB prior to transfer;
- c) Review of the participant's case file by the transferring LWDB prior to transfer;
- d) Review of the participant's case file by the receiving LWDB prior to approving transfer;
- e) Discussion and resolution of any identified issues between LWDBs;
- f) Requesting guidance from DEO via email at WIOA@deo.myflorida.com for customers files and Employ Florida services that are not in good standing and cannot be resolved between LWDBs.

Note: LWDBs may not decline to accept transferring customers without consulting DEO.

To complete a WIOA Title I or TAA participant transfer, the transferring LWDB must close all open Employ Florida activities and plans, and submit the following to PRA@deo.myflorida.com:

- The LWDB and office the participant is being transferred from;
- The LWDB, office and staff member the participant is being transferred to;
- Documentation of the agreed upon transfer from both LWDB's (email); and
- The participant's State ID and Employ Florida Program Application ID.

Note: WIOA Title III (Wagner-Peyser) cases do not require transfer. However, before providing staff-assisted services, staff must update the participant's Employ Florida Wagner-Peyser Program Application and individual registration to their respective LWDB.

E. Case Closure

When staff have determined a participant no longer requires services 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 in Employ Florida. This will immediately stop the addition of any other program services and prompt staff to gather any employment data.

Case closure is a case management feature of Employ Florida and should not be confused with a participant exit, which is federally defined and structured. The decision to close the case should be documented accordingly by staff in 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 participant should remain a program participant long enough to be stable in a job or post-secondary education.

Prior to closing a participant's case, staff must:

- a) Ensure the Individual Employment Plan/Service Strategy (IEP/SS) Plan has been closed out. (see the [Virtual One-Stop User Guide for Staff, Section 4: Individuals - Case Management](#) for further guidance);
- b) Ensure all services have been closed;
- c) Enter any credential(s) earned during the program, including the type, verification and credential date to the Closure Information tab or Credential Section. (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance);
- d) Make sure any Measurable Skill Gains attained during the program have been added to the participant's Measurable Skill Gains (MSG) ribbon or, individuals below postsecondary education level literacy/numeracy gains or to the

- Educational Functioning Level for MSG ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance); and
- e) Add any unsubsidized or On-the-Job Training (OJT) employment entered during the program or at closure to the Add Employment ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance).

Note: LWDBs may delete case closures for participants who request or demonstrate a need for continued services if the participant has not exited. For participants who have exited, the case closure may not be deleted if 90 days has lapsed, and a new program application in Employ Florida will be required for the participant.

F. Follow-Up Services

For WIOA Adult and Dislocated Worker programs, follow-up services may begin immediately following placement into unsubsidized employment if no future services (other than follow-up services) are scheduled or expected. For the WIOA Youth program, follow-up services may begin immediately following the last date of service if no future services (other than follow-up services) are scheduled or expected.

Follow-up services do not cause the exit date to change, delay exit or trigger re-enrollment in the program. LWDBs must provide and document WIOA follow-up services in Employ Florida unless the participant refuses services. If a participant refuses follow-up services, staff must document the refusal with a case note in Employ Florida. Guidance regarding the recording of follow-up services in Employ Florida is available in the [Virtual OneStop® User Guide for Staff, Section 6: Programs - WIOA](#). Employ Florida follow-up service codes are outlined in the [Employ Florida Service Code Guide](#).

Note: Follow-up services are not required for TAA or Wagner-Peyser participants, or any WIOA Title I participant exited due to a global exclusion, as described in [Section IV.G.2](#) of this policy.

G. Exits

Individuals who are participating in more than one program covered under the common exit policy will have a single common exit date. The participant's exit occurs when he/she has:

- a) Not received services for at least 90 calendar days from any programs to which the common exit policy applies; and
- b) No future services scheduled, except for self-service, information-only activities, or follow-up services.

The participant's exit date cannot be determined until 90 days have elapsed since the participant last received a participating service and no services are scheduled for the future. The exit date is applied retroactively to the last service date. There are two (2) different types of exits:

1. System Exit

System (soft) exit occurs automatically after participants receive no staff-assisted services for 90 days in either WIOA Title I, WP, or TAA programs. Exit will occur automatically based on actual or projected end dates of reported participating services/activities. For WIOA and TAA, case notes should support the last date of staff-assisted services provided with activity end dates that accurately reflect the actual last service provided.

In some cases, WIOA and/or TAA activities may be completed but the participant continues to receive WP services, which will extend program exit. Exit is often triggered by completion of training, successful transition into employment, or loss of contact. The completion of training and successful transition into employment must be documented in services with corresponding activity end dates. However, if the participant is not engaged in open WIOA activities, loss of contact must only be documented in a case note. WIOA participants who are exited due to a loss of contact must follow the closure guidelines in [Section IV.E](#) of this policy.

2. Manual Exit

Manual (hard) exits are not allowed unless the participant falls into one of the WIOA Title I global exclusion scenarios. Otherwise, participants must be soft exited from the system to be closed out after 90 days of receiving no staff-assisted services.

Participants may be excluded from the Primary Indicators of Performance Measures, at the time of closure, for any of the following global exclusions that precludes the participant from entering employment or participating in services:

- a) **Institutionalized:** The participant exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center while receiving services as a participant.
- b) **Health/Medical:** The participant exits the program because of a medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- c) **Deceased:** The participant is deceased.

- d) **Reservist called to Active Duty:** The participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.
- e) **Foster Care (WIOA Youth Only):** The participant is in the foster care system, as defined in 45 CFR 1355.20(a) and exits the program because the participant has moved from the local workforce development area as part of such a program or system.

Note: If a participant is exited due to a global exclusion and it is due to a medical reason or disability, staff must collect information in a separate file and not disclose in case notes the details pertaining to the reason for exit. The exclusionary/neutral exit reasons that could disclose medical or disability-related information are:

- a) Health/medical issues; and
- b) Residing in an institution or facility providing 24-hour support, such as prison or hospital.

LWDB staff should submit requests to create a manual closure through global exclusion in writing to the LWDB's Data Integrity Specialist (DIS) or an individual designated by LWDB as the approving authority for global exclusions. LWDB staff should state the reason for the request and provide the name and state identification number of the participant in order to receive approval from the approving authority to create a closure and exclusion on behalf of the LWDB.

If the approval to create the closure and exclusion is granted, then the requesting staff member is solely responsible for ensuring that all the necessary and required documentation has been secured and uploaded to Employ Florida for verification purposes. The approving authority must review all the necessary documentation before the hard exit and exclusion is created. LWDBs should reference the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA, 6-133](#) for further guidance.

H. Mismanagement of Exits

The participant's exit must not be prolonged by staff extending service dates, removing exits, or opening new services unless it is demonstrated and documented in Employ Florida that the participant has unmet needs and is actively being served. Additionally, Employ Florida service codes that are not training or work experience services must not be future dated to extend participation. Attempts to re-engage a participant do not constitute a participating service for the purpose of providing a service or keeping an activity open. These contacts must instead be documented by case notes or by the appropriate non-participating service. Prolonging exit due to the inability to contact a participant is inappropriate.

The following actions do not constitute a service nor direct contact with a participant for the purpose of extending participation:

- a) Leaving voicemail messages for the participant;
- b) Speaking with relatives of the participant who are not the participant's guardian(s);
- c) Scheduled services or an offer to provide services;
- d) Sending flyers, letters or postcards;
- e) Speaking with the participant's parole officer;
- f) Casual, unscheduled conversations with the participant in public;
- g) Having the participant bring in time sheets and/or attendance records for payment without providing meaningful guidance, service or conducting a review of the participant's IEP; and
- h) Contacts to obtain employment status, educational progress, need for additional services or income support payments without providing meaningful guidance, service or conducting a review of the participant's IEP.

I. State and Local Monitoring

DEO will monitor the requirements outlined in this policy and local operating procedures. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum:

- a) Roles of the participant and LWDB staff; and
- b) Local monitoring procedures for implementation of this policy.

V. DEFINITIONS

Common Exit - Occurs when a participant has not received services (excluding self-service, information-only service or activities, or follow-up services) from any program covered by the common exit policy for at least 90 days, and no future services are planned. The common exit date for all program in which the participant is enrolled will be the end date of the last participating service the participant received.

Data Integrity Specialist - An individual designated by the LWDB and provided elevated system privileges by the Local Employ Florida Administrator to assist with maintaining security protocols and data validation in the State's labor exchange and case management system, Employ Florida.

Non-Participating Service - A service that does not commence or extend program participation. Supportive services, self-service, information-only services, administrative, follow-up services, and locally defined services are non-

participation services. (Exception: for WIOA Youth, supportive services are a participation service).

Participant - An individual who is determined eligible to participate in the program and receives a service funded by the program in either a physical location (CareerSource Florida Network Career Center or affiliate site) or remotely through electronic technologies.

Participation Date - The first day, following a determination of eligibility, (if required), that the individual begins receiving a staff-assisted participating service funded by the program.

Participating Service - A program-funded, staff-assisted service provided to an eligible applicant, other than supportive services, self-service, information-only services, administrative, local defined, or follow-up services. (Exception: for WIOA Youth, supportive services are a participating service).

Reportable Individual - A jobseeker who engages with the workforce system on an initial level through non-participation services and may not have met program requirements for eligibility or participation.

VI. REVISION HISTORY

Date	Description
06/15/2021	Issued by Florida Department of Economic Opportunity.
06/09/2021	Approved by CareerSource Florida Board of Directors.

VII. RESOURCES

[Workforce GPS Performance Reporting Community](#)

[USDOL WIOA Technical Assistance Resources and Tools](#)