



Missouri Division of Workforce Development
DWD Issuance 17-2017

Issued: January 16, 2018
Effective: January 16, 2018

Subject: Point of Exit for Reporting Indicators of Performance

1. Purpose: This Issuance updates Division of Workforce Development (DWD) policy prohibiting manipulation of participant records to prevent timely exit¹ from programs subject to performance accountability provisions² of the Workforce Innovation and Opportunity Act (WIOA).³ It reinforces consequences for knowingly posting false services or activities in DWD’s statewide electronic case management system with the intent to extend program participation artificially. This Issuance updates, supersedes, and rescinds previous policy⁴ on this topic.

2. Background: Guidance⁵ from the U.S. Department of Labor (DOL) Employment and Training Administration (ETA) defines the “point of exit” for performance reporting. This guidance clearly establishes policy restricting program operators’ control of the date of exit from the workforce programs included in the Primary Indicators of Performance. Having gone 90 days without receiving a countable service, the customer exits the program(s) for performance-accountability purposes.

Any authorized user who knowingly or willingly posts a false activity or service in DWD’s statewide electronic case management system (or any authorized user who instructs another user to post such an activity) to prevent a timely exit will be falsifying a record and compromising the integrity of the record and/or database. Such an action constitutes a violation of DWD’s Confidentiality and Information Security Plan,⁶ subject to the disciplinary and/or legal penalties therein. This can include suspension or debarment from access to the case management system or termination of employment. Depending on its severity, such action also may constitute violation of State⁷ or federal laws or regulations⁸ and may be subject to additional administrative remedies or criminal prosecution.

¹ [20 CFR 677.150\(c\)](#).

² https://www.doleta.gov/performance/guidance/tools_commonmeasures.cfm.

³ Pub. L. 113-128 [[29 U.S.C. 3101 et seq.](#)].

⁴ DWD Issuance 13-2012, “Point of Exit for Common Measures Reporting,” December 19, 2012 [*herein rescinded*].

⁵ U.S. Department of Labor, Employment and Training Administration Training and Employment Guidance Letter ([TEGL](#)) 10-16, [Change 1](#), August 23, 2017.

⁶ [DWD Issuance 13-2016](#), “Confidentiality and Information Security Plan for the Workforce Development Statewide Electronic Case Management System,” March 13, 2017.

⁷ [RSMo 105.452](#), [RSMo 288.395](#), [RSMo 405.1500.1](#), and [RSMo Chapter 576](#).

⁸ [2 CFR 200.207](#) and [2 CFR 200.338](#).

3. Substance:

ETA guidance⁹ establishes the definition, as do the regulations implementing WIOA.¹⁰ “Program exit” means a participant has not received a service funded by the program or funded by a partner program for ninety (90) consecutive calendar days, and is not scheduled for future services. The exit date is the last date of service.

The Operational Parameters beginning on page 33 of [TEGL 10-16, Change 1](#), specifically describe tasks that do not constitute countable services extending the period of participation. These include receipt by the participant of any self-service, information-only services or activities, or follow-up services.

Case management services and any other required administrative caseload management activities that involve regular contact with the participant or employer to obtain the participant’s employment status, educational progress, or need for additional services also do not constitute services that extend the period of participation.

If a participant is not scheduled for future services, then all services, activities, goals, objectives, and the individual employment plan in DWD’s statewide electronic case management system must be closed. For reporting purposes, all exit information must be completed according to guidance provided for the case management system. This includes, but is not limited to, entered employment, school status, youth placement, and credential obtainment.

The phrase “and not scheduled for future services” does not apply to a participant who voluntarily withdraws or drops out of a program.

Posting a countable service after only completing one of the non-countable tasks described above constitutes falsification of a federal report, which will not be tolerated by DWD. Upon discovery of this, or any other federal report falsification, DWD will take appropriate action to determine the extent of the falsification and require disciplinary action commensurate with the degree of the falsification, as required by existing policy, regulations, and laws.

4. Action:

Effective immediately, each Local Workforce Development Board (Local WDB) must instruct all staff to comply with this policy. It is the responsibility of the Local WDB to monitor for compliance with this policy on an ongoing basis. Any instance of falsification of a participant record must be addressed immediately to ensure accurate federal reporting.

5. Contact:

Please direct questions or comments regarding this Issuance to the DWD Quality Assurance Manager at (573) 522-3015, or by email at steve.reznicek@ded.mo.gov.”

6. References:

U.S. Department of Labor, Employment and Training Administration Training and Employment Guidance Letter ([TEGL](#)) 10-16, [Change 1](#), August 23, 2017.

[DWD Issuance 13-2016](#), “Confidentiality and Information Security Plan for the Workforce Development Statewide Electronic Case Management System,” March 13, 2017

⁹ [TEGL 10-16, Change 1](#).

¹⁰ [20 CFR 677.150\(c\)](#).

7. Rescissions: This Issuance supersedes and replaces DWD Issuance 13-2012, "Point of Exit for Common Measures Reporting," dated December 19, 2012.

8. Attachments: None.

The Missouri Division of Workforce Development is an equal opportunity employer/program.

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Missouri TTY Users can call (800) 735-2966 or dial 7-1-1.



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