



**PY'01 WIA Notice No. 07**

To: Chief Elected Officials  
Local Workforce Investment Board Chairs  
WIA Title IB Administrators  
Local Workforce Investment Board Staff  
WIA State Agency Liaisons  
Other Interested Persons

Subject: Enforcement of the WIA Title I "Soft Exit" Policy

Date: July 8, 2002

**I. Purpose:**

To describe how the WIA Title I "soft exit" policy will be enforced.

**II. Issuances Affected:**

a) References:

USDOL Training and Employment Guidance Letter No. 7-99, dated March 3, 2000

PY 1998 JTPA Policy Letter No. 98-433, dated October 20, 1998

b) Rescissions:

None

**II. Subject Index:**

**George H. Ryan, Governor**  
**Gertrude W. Jordan, Director**

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WIA Reporting Requirements

**IV. Background:**

USDOL has issued its performance management requirements for Title I of the Workforce Investment Act via USDOL Training and Employment Guidance Letter No. 7-99, dated March 3, 2000. One of these requirements is the procedures whereby WIA customers are recognized as having exited the Title I program. The TEGLE establishes two types of exit situations: a "hard" exit and a "soft" exit.

The USDOL definition of exiter is as follows:

For all of the core measures (except the younger youth skill attainment rate and employer customer satisfaction measure), comparability across States is only possible if a single point in time is used to begin measurement. The term "exit" is being used to determine when to count an individual in a specified reporting period. Each individual becomes part of an exit cohort, a group who are determined to be "exiters" within a particular quarter and are looked at together for measurement purposes. There are two ways to determine exit during a quarter:

1. a participant who has a date of case closure, completion or known exit from WIA-funded or non-WIA funded partner service within the quarter (hard exit) or
2. a participant who does not receive any WIA-funded or non-WIA funded partner service for 90 days and is not scheduled for future services except follow-up services (soft exit).

Participants who have a planned gap in service of greater than 90 days should not be considered as exited if the gap in service is due to a delay before the beginning of training or a health/medical condition that prevents an individual from participating in services. Service providers should document any gap in service that occurs with a reason for such a gap in service. Participants who exit from services because they are incarcerated, institutionalized, deceased, have a health/medical condition that prevents the individual from participating in services or are Reservists called to active duty who choose not to return to WIA, are excluded from the measures.

Once a participant has not received any WIA funded or partner services for 90 days, except follow-up services and there is no planned gap in service or the planned gap in service is for reasons other than those specified above, that participant has exited WIA for the purposes of measurement in 15 of the 17 core measures (the younger youth skill attainment rate and employer customer satisfaction measures are not based on exit.)

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The exit date is the last date of WIA funded or partner service received (except follow-up services). For a soft exit, the exit date cannot be determined until 90 days has elapsed from the last date of service. *At that point, the exit date recorded is the last date of service.* The exit quarter (referred to throughout the definitions of the measures) is the quarter in which the last date of service (except follow-up services) takes place. If a participant exits WIA and receives additional WIA services after exiting, that participant is treated as a new participant for purposes of the core measures and will be included in the appropriate measures. The definition of exit applies to all of the core measures except the younger youth skill attainment and employer customer satisfaction measures.

Since the above requirements state that the date of exit to be recorded in the case of a soft exit is the last date of service, this means that for these types of exiters, there will be a "built-in" data lag of up to 90 days.

In PY 1998 JTPA Policy Letter No. 98-433, dated October 20, 1998, the department reiterated its requirement that all participant transactions, including exits (then referred to as terminations) must be entered into the department's management information system within 30 calendar days of the transaction date. This requirement remains in effect.

For purposes of exit data entry requirements for WIA Title I, in light of the USDOL requirements noted above, the department will interpret the meaning of "transaction" in its data entry policy as referring to the date on which the customer is recognized as qualifying for a "soft exit," not the exit date itself.

The practical result of this interpretation is that exit records entered into the TRAC system within 120 calendar days of the exit date are considered compliant with the USDOL policy on soft exit, as well as the department's policy on data entry timeliness.

It has come to the department's attention that several Local Workforce Investment Area administrators may have been unclear about these requirements, and have as a result entered data into the TRAC system for exiters outside of the parameters permitted by the policy. As a result, the department has determined that it is necessary to enforce these requirements via appropriate edits to the exit record process in TRAC.

In order to provide for an orderly enforcement method for the above policy, the department will phase in the edits between July 1, 2002 and November 30, 2002.

**V. Policy:**

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IDES has modified the edits that apply to the TRAC Exit Date field for WIA and JTPA customers. This edit has been revised because it was found that a substantial number of exiters in some LWAs have not had their exit records entered on the TRAC system in a timely manner.

As of July 1, 2002, TRAC will enforce a phased reduction of the acceptable data entry lag for Exit records. The following edits will apply:

- 1) July 1 through July 31 - exit date can be no more than 360 days prior to the Exit record data entry date.
- 2) August 1 through August 31 - exit date can be no more than 330 days prior to the Exit record data entry date.
- 3) September 1 through September 30 - exit date can be no more than 300 days prior to the Exit record data entry date.
- 4) October 1 through October 31 - exit date can be no more than 250 days prior to the Exit record data entry date.
- 5) November 1 through November 30 - exit date can be no more than 190 days prior to the Exit record data entry date.
- 6) December 1 and later - exit date can be no more than 120 days prior to the Exit record data entry date.

This edit will apply only to JTPA and WIA titles. It does not affect the TAA/NAFTA, Veterans or Welfare to Work programs.

**VI. Action Required:**

Each LWIA grant recipient and other appropriate entities should be made aware of the above requirements for recognition of WIA "soft exits" and timely entry of these records into the TRAC system.

**VII. Inquiries:**

Program manager

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**VII. Effective Date:**

July 1, 2002

Sincerely,

Herbert D. Dennis, Manager  
Job Training Division

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