



# Montana Department of LABOR & INDUSTRY

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2 Division: Workforce Services Division  
3 Category: WIOA  
4 Effective Date: TBD  
5 Last Revised: N/A  
6 Policy No.: TBD

## Quality Control Policy

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8 **Background:** Montana receives Workforce Innovation and Opportunity Act (WIOA) funding from the  
9 Employment and Training Administration (ETA) based on achieving negotiated performance. ETA's expectations  
10 are that work is done in a timely manner and correctly reported on a quarterly basis. ETA reserves the right to  
11 sanction any state that does not meet negotiated performance or is late or fails to report.

12 **Scope:** This policy applies to all service providers operating WIOA programs, WIOA program managers and  
13 Division Management Services (DMS) Bureau. This policy is effective (*insert date upon SWIB approval*).

### Policy:

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  - A significant failure to meet these requirements based on program monitoring may result in formal  
16 corrective action if there is no improvement from one year to the next.

### Data Entry:

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  - Timely data entry affects performance reporting and Workforce Services Division (WSD) staff workload if  
19 information needs to be backdated. The program manager requires notification if data entry cannot be  
20 accomplished within seven working days. Timely data entry will be determined based on files reviewed  
21 at random times and during monitoring visits.

### Correct Data Entry:

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  - Data entry affects performance reporting and program manager workload when corrections to data in  
24 MWorks must be made. The WIOA Application is the only source of documentation for many fields in  
25 MWorks required for quarterly reporting to ETA. ETA compiles statistics on demographic data for  
26 different WIOA populations to determine how they are effectively being served through the program.  
27 Incorrect data skews these statistics and does not show an accurate representation of service to WIOA  
28 clients.

### Appropriate Documentation:

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  - Many elements of WIOA enrollment require appropriate documentation be placed in client files.  
31 Documentation sources can be identified on the [WIOA Application or the program Verification](#)  
32 [Worksheets](#). Missing documentation will be identified during monitoring visits.

### Credential Attainment:

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  - The **Credential Attainment** performance measure requires entry of a credential attained during the  
35 client's enrollment or within four quarters after exit. This performance measure applies to Adult,  
36 Dislocated Worker, and Youth clients. Credentials must be documented using a transcript, certificate,  
37 diploma, or a letter from an appropriate training institution. If there is not a specific date on the

1 credential, the actual date must be documented with one of the other sources listed previously. The  
2 credential must be entered on the Follow-Up tab in MWorks. If not entered in this area, credentials will  
3 not be counted for performance reporting. Deficiencies in credential entry will be identified through  
4 quarterly reporting and monitoring.

### 5 Measurable Skills Gains:

- 6 • The Measurable Skills Gain performance measure includes anyone who received training during their  
7 participation period. People who receive **On-the-Job-Training (OJT)** and **Customized Training** are included  
8 in the measure unlike the Credential Attainment measure. The performance measure applies to Adult,  
9 Dislocated Worker, and Youth clients. The Measurable Skill Gain is reported on a yearly basis and is not  
10 an exit based measure. All Measurable Skill Gains must be entered into MWorks timely. A provider shall  
11 not wait until exit to enter Measurable Skill Gains.
- 12 • Enter all Measurable Skill Gains into MWorks even though clients are only given credit for one gain per  
13 program year unless the client has two or more participation periods within one program year.
- 14 • Documenting Measurable Skill Gains in the client file is required. These include:
  - 15 ○ Achieving at least one educational functioning level:
    - 16 ■ Pre and Post TABE tests
  - 17 ○ Attainment of secondary school diploma or equivalent:
    - 18 ■ Copy of the High School diploma or equivalent (HiSET)
  - 19 ○ Secondary or Postsecondary transcript or report card:
    - 20 ■ For Secondary Education, use a copy of the transcript or report card for one semester  
21 showing the client is passing all classes. Use the semester end date as the date the  
22 Measurable Skill Gain was received.
    - 23 ■ For Postsecondary Education, use a copy of the transcript or report card. The gain must  
24 demonstrate a sufficient number of credit hours of successful completion. Use the  
25 semester end date as the date the Measurable Skill Gain was received.
      - 26 • Full Time (12 hours or more) must complete one semester
      - 27 • Part Time (less than 12 hours) must complete two consecutive semesters
  - 28 ○ Established milestones such as completion of OJT or one year of an apprenticeship program:
    - 29 ■ Use a progress report from an employer or training program. Use the date of the report  
30 as the date of the Measurable Skill Gain. Progress reports may include training reports  
31 on milestones completed as the individual masters the required job skills, or steps to  
32 complete an OJT or apprenticeship program. Increases in pay may be used that are  
33 resulting from newly acquired skills or increased performance. Use the date of the pay  
34 increase as the date of the gain.
  - 35 ○ Successful passage of an exam that is required for an occupation or progress in attaining  
36 technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge  
37 based exams.
    - 38 ■ Use a copy of the exam or benchmarks.

### 39 Follow-Up Contact:

- 40 • Follow-up information is used for performance reporting in cases where Unemployment Insurance or  
41 federal wage records are not found. Follow-up contact is required for all Youth clients who exit to a  
42 reason other than “cannot locate” or the client does not want to participate in Follow-up and for Adult  
43 and Dislocated Worker clients who exit to employment. Follow-Up contact information can be used for  
44 three Primary Indicators of Performance measures:
  - 45 ○ Employment Rate – 2<sup>nd</sup> quarter after exit
    - 46 ■ Youth – In education or employment in 2<sup>nd</sup> quarter after exit
  - 47 ○ Employment Rate – 4<sup>th</sup> quarter after exit
    - 48 ■ Youth – In education or employment in 4<sup>th</sup> quarter after exit
  - 49 ○ Median Earnings – 2<sup>nd</sup> quarter after exit

- 1 • Follow-up contact is required to be entered on the Follow-up tab in MWorks. It will not be reported
- 2 properly if it is entered in any other area in MWorks. To be considered valid, a comment shall be entered
- 3 in the Comments section on the Follow-up tab for each Follow-up contact.
- 4 • The comment shall state:
  - 5 ○ Employer name,
  - 6 ○ Address,
  - 7 ○ Phone number,
  - 8 ○ Job title if the client is employed,
  - 9 ○ Wages, and
  - 10 ○ Number of hours per week client is working.
- 11 • If the client is in training after being exited, a brief description shall be entered in the Comments
- 12 section.
- 13 • Follow-up contact is the only source for verifying that a Youth client is in training after they are exited
- 14 from the WIOA Youth program. This information must be entered on the Follow-up tab in MWorks.
- 15 • Deficiencies in completing Follow-up contact will be identified through monitoring.

16 **Youth Component Services:**

- 17 • Federal reporting to ETA requires reporting the most recent date a Youth component service is provided.
- 18 • Youth case managers are required to use the Tasks in MWorks to document various activities and
- 19 services that are provided for Youth clients in the following categories:
  - 20 ○ Educational achievement services: tutoring, study skill training, instruction leading to a
  - 21 secondary school diploma or equivalent, or occupational skills training;
  - 22 ○ Alternative secondary school services or dropout recovery services;
  - 23 ○ Work Experience including summer employment opportunities, pre-apprenticeship programs,
  - 24 internships and job shadowing;
  - 25 ○ Education offered concurrently with workforce preparation;
  - 26 ○ Leadership development opportunities;
  - 27 ○ Supportive Services;
  - 28 ○ Adult mentoring services;
  - 29 ○ Comprehensive guidance and counseling services;
  - 30 ○ Follow-up services;
  - 31 ○ Entrepreneurial skills training;
  - 32 ○ Labor market information services; and
  - 33 ○ Postsecondary transition and preparatory activities.

34 **Deficiency Consequences:**

- 35 • ETA has the option of sanctioning states for not meeting acceptable performance. Acceptable
- 36 performance depends on information entered correctly in MWorks and appropriate documentation
- 37 placed in client files. Deficiencies in any of the above areas will result in a service provider being placed
- 38 on corrective action. If deficiencies are identified after a provider has been placed on corrective action,
- 39 a portion of WIOA funding may be revoked.
- 40 • Deficiencies in the requirements can lead to corrective action. Problems with any of the above functions
- 41 may be identified through monitoring or through day-to-day functions. WSD will determine whether there
- 42 are errors for any of the areas identified above, and whether they are substantial enough to warrant
- 43 corrective action or possible sanction.

44 **Monitoring Deficiency Consequence Table:**

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| <b>Baseline:<br/>Yearly monitoring/incidental<br/>findings</b> | <b>WSD staff will identify any monitoring findings and discuss these with service<br/>providers during exit.<br/>Deficiencies will be noted on monitoring reports after onsite review.</b> |
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|  | <b>Incidental findings will be discussed with service providers as problems are identified.</b>   |
| <b>Corrective Action:<br/>Second year<br/>monitoring/incidental<br/>findings</b> | WSD staff will identify monitoring findings that have not been resolved from the previous year's monitoring or continue to be an issue. Service providers may be placed on corrective action notice if there are unresolved problems or issues that continue to occur.<br>Incidental findings that continue to occur may result in service providers being placed on corrective action. |
| <b>Sanctioning:<br/>Third year<br/>monitoring/incidental<br/>findings</b>        | Monitoring or incidental findings that have not been resolved from the previous year or continue to occur may result in sanctioning of a service provider.  |

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- Monitoring, Audits, Performance and Sanctions Policy