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Purpose

The purpose of this policy is to ensure compliance with federal performance reporting requirements for the Pathways Home 3 program. Accurate, timely, and complete data entry is essential to track participant outcomes, measure progress, and report on key performance indicators (KPIs) to the Department of Labor (DOL). This policy establishes procedures for data collection, entry, and reporting to address the gaps identified in the monitoring report and ensure ongoing compliance with the performance reporting requirements.

Procedural Guidelines

All staff involved in the Pathways Home 3 program must adhere to the data collection and reporting standards outlined in this policy. This includes case managers, quality assurance personnel, and program management. All performance data must be reported through the Grantee Performance Management System (GPMS) and must align with the DOL's WIOA performance measures and indicators.

Performance Data to Report:

1. **Employment Rate – Second Quarter After Exit:** Percentage of participants employed in the second quarter after exit.
2. **Employment Rate – Fourth Quarter After Exit:** Percentage of participants employed in the fourth quarter after exit.
3. **Median Earnings – Second Quarter After Exit:** Median earnings of participants in the second quarter after exit.
4. **Credential Attainment:** Percentage of participants who attain a recognized credential during participation or within one year after exit.
5. **Measurable Skill Gains:** Percentage of participants who achieve measurable skill gains during participation in education or training programs.
6. **Recidivism Rate:** Percentage of participants who are convicted of a new criminal offense within twelve (12) months of release.

1. Data Collection and Entry

To ensure accurate performance reporting, case managers and program staff must follow the procedures below:

A. Intake and Enrollment Data Collection:

- **Responsibility:** Case managers are responsible for collecting all necessary intake and eligibility data during the participant's enrollment.
- **Procedure:**
 1. All intake information, including demographic data, eligibility documentation, and participant goals, must be entered into the GPMS within five (5) business days of enrollment approval.
 2. Ensure that key data fields, such as employment status, educational level, and vocational training status, are completed and accurate.
 3. Verify that all documents are uploaded into the system, including ID, proof of incarceration, and release date documentation.

B. Service Provision Data:

- **Responsibility:** Case managers are responsible for updating service provision data (e.g., workshops attended, supportive services provided) in real time.
- **Procedure:**
 1. Record services provided (job readiness workshops, career counseling, etc.) within 48 hours of service delivery.
 2. Document participant progress in achieving measurable skill gains and credential attainment.
 3. All updates to participant IDPs must be reflected in GPMS.

C. Exit and Follow-Up Data:

- **Responsibility:** Case managers must ensure that exit data is complete, and follow-up services are documented.
- **Procedure:**
 1. Complete participant exit forms and ensure all services and outcomes are entered into GPMS within 10 business days after exit.
 2. Record post-exit follow-up services (e.g., job placements, housing assistance) for twelve (12) months post-release, ensuring follow-up data is entered at thirty (30), sixty (60), ninety (90) days, and quarterly thereafter.
 3. Ensure employment status, earnings, and recidivism data are entered in accordance with DOL reporting requirements.

2. Data Validation and Quality Assurance A.

Data Validation:

- **Responsibility:** The Quality Assurance (QA) Manager is responsible for validating data entries to ensure accuracy and completeness.
- **Procedure:**
 1. Conduct random audits of participant files on a quarterly basis to ensure data integrity.
 2. Cross-check participant service records with supporting documentation (e.g., timecards, IDP updates).
 3. Ensure all outcome data matches participant records and supporting documentation.

B. Data Reconciliation:

- **Responsibility:** Program staff must reconcile discrepancies in performance data as part of the monthly data quality review process.
- **Procedure:**
 1. If discrepancies or missing data are identified, the QA Manager will work with the case manager to reconcile and correct data within five (5) business days.
 2. Use the GPMS reporting feature to identify incomplete or missing data fields.
 3. Ensure that corrections are documented, and any necessary revisions are communicated to staff involved.

3. Performance Reporting Timelines

A. Monthly Reporting:

- **Responsibility:** The Program Manager is responsible for ensuring monthly performance reports are submitted on time.
- **Procedure:**
 1. Pull monthly reports from GPMS to assess performance progress on key indicators.
 2. Review employment, credential attainment, and skill gains against targets and timelines.
 3. Ensure any issues or discrepancies are addressed by the case management team before submitting the report to DOL.

B. Quarterly Reporting:

- **Responsibility:** The Program Manager must ensure all quarterly performance reports are submitted on time.
- **Procedure:**
 1. Coordinate with the QA Manager and case managers to compile and review data for quarterly reporting.
 2. Submit the **Quarterly Progress Report (QPR)** to DOL, including all required performance indicators.

C. Annual Reporting:

- **Responsibility:** The Program Manager and QA Manager will collaborate on compiling the **Annual Performance Report**.
 - **Procedure:**
 1. Ensure all performance data for the fiscal year is accurate and up-to-date in GPMS.
 2. Provide detailed analysis of program success, including metrics on employment rates, median earnings, credential attainment, and measurable skill gains.
 3. Submit the annual report by the designated DOL deadline.
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Staff Training and Compliance

A. Staff Training:

- **Responsibility:** The QA Manager is responsible for providing training to all staff on performance reporting requirements and the use of GPMS.
- **Procedure:**
 1. Provide training on data collection and entry procedures during onboarding for all new staff.
 2. Offer quarterly refresher trainings on accurate data entry, compliance with DOL guidelines, and performance metrics tracking.
 3. Monitor staff compliance through regular reviews and provide additional training as needed.

B. Ongoing Compliance:

- **Responsibility:** The Program Manager and QA Manager are responsible for ensuring ongoing compliance with DOL reporting requirements.
 - **Procedure:**
 1. Perform quarterly reviews of all staff to ensure adherence to data entry and reporting protocols.
 2. Address non-compliance issues through corrective action plans, which may include additional training, close monitoring, or other interventions.
 3. Ensure corrective actions are documented and monitored for effectiveness.
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Internal Review and Auditing

A. Internal Audit Process:

- **Responsibility:** The QA Manager will conduct internal audits on a quarterly basis to ensure accuracy and completeness in performance reporting.
- **Procedure:**
 1. Review a sample of participant files to validate accuracy of data entered into GPMS.
 2. Check for missing or incomplete data in performance reports.
 3. Submit a quarterly audit report to the Program Manager with recommendations for improvement, if applicable.

B. Corrective Actions for Non-Compliance:

- **Responsibility:** In the event of non-compliance or inaccurate reporting, corrective action will be taken by the QA Manager.
- **Procedure:**
 1. Identify the root cause of the reporting error (e.g., staff error, system issue).

2. Develop a corrective action plan with timelines and specific steps to prevent recurrence.
3. Monitor progress and ensure that all corrective actions are completed within 30 days.

References

- **TEGL 10-16, Change 3:** Guidance on WIOA Performance Indicators.
- **GPMS User Manual:** Instructions for data entry and reporting in the GPMS system.
- **WIOA Section 116:** Detailed description of performance indicators for workforce programs.

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