

Appendix C

GUIDANCE ON PERIOD(S) OF INACTIVE STATUS

In the interests of improved customer service and enhanced flexibility in program design and implementation, The Department is adopting a modified reporting policy pertaining to periods of inactive status. This policy applies to Titles II-A/C, Title III and Section 204(d) reporting requirements under JTPA. Effective Program Year 1996, programs may continue to provide program services to a participant and are not required to terminate the participant as long as these services are **substantial** and **frequent**. For Titles II-A/C and Section 204(d), substantial services are defined as those authorized in Section 204(b) of the Act. For Title III, substantial services are defined as those authorized in Sections 314(c), (d) and (h). For all subject programs, frequent is defined as occurring at least every 90 days.

As before, Title II-A/C, Title III and Section 204(d) programs are required to terminate all participants who for more than 90 days have received no substantial program services.

This policy allows SDAs/SSAs to keep a customer active in the program after the completion of training while he/she is receiving services as long as no more than 90 days elapse between **substantial services**. The Department believes our customers--many of whom are experiencing problems with attachment to the workforce--need services no less frequently than every 90 days to reinforce their workforce attachment. Program operators should also bear in mind that there is an additional 90-day period between termination and follow-up, at which time programs' success in placing individuals in jobs is measured for Title II-A performance standards purposes. This may mean, for example, that there is no need to keep an individual in inactive status if the individual is waiting to begin employment on a date certain within 90 days of last receipt of substantial services.

There is considerable local flexibility in the types of service which can be provided under the Act. For example, labor market information or job development would be appropriate interventions during this period. The Department also believes providing greater MIS consistency between JTPA titles will eliminate possible sources of confusion in reporting.

Requirements pertaining to the development of customers' individual service strategies (ISSs) and/or individual readjustment plans are not changed and remain in effect. Authorized services provided to customers should be incorporated

in their individual service plans no matter what the length of the permissible interval between services.

The reporting instructions for the Federally required JTPA/EDWAA annual reports, issued under the provisions of Section 165 of the Act, are to be considered as extensions of JTPA legislation and regulations. The Department does not grant waivers for the required termination of JTPA participants beyond the time periods specified above. In cases when a participant requires continued services after those provided during the specified period(s) of inactive status, when such services cannot be provided as post-termination services, the individual may, after being terminated, be reenrolled as a new participant in the JTPA funded program(s) for which s/he is eligible.