

FOLLOW-UP CAREER SERVICES

Policy Number: 220, Revision 3 Effective Date: July 1, 2019 Date Last Revised: July 1, 2022

I. <u>BACKGROUND:</u>

The Workforce Innovation and Opportunity Act (WIOA) established the requirements for delivery of Career Services through the One-Stop Delivery System, as referenced in WIOA Sec. 129(b)(2)(C) and 134(c)(2)(A)(xii). The One-Stop system is the basic delivery system for Adult, Dislocated Worker and Youth services. Through this system, participants can access a continuum of services. The services are organized into three levels: Basic Career Services, Individualized Career Services and Follow-Up Career Services. This bulletin will cover the requirements for Follow-Up Career Services.

For <u>Adult and Dislocated Worker</u> WIOA Sec. 134(c)(2)(A))(xiii), WorkSource System Policy 5620, Revision 1 and the Training and Employment Guidance Letter (TEGL) 10-16, Change 1, provides for Follow-Up Career Services for participants in workforce investment activities authorized under WIOA who are placed in unsubsidized employment.

Follow-Up Career Services can only be provided to <u>Adult and Dislocated Worker</u> participants who are placed in unsubsidized employment at program completion and must be provided for not less than 12 months after exit. Follow-Up Career Services do not extend the date of exit in performance reporting.

The goal of Follow-Up Career Services is to ensure job retention, wage gains and career progress for participants who have been referred to unsubsidized employment.

For <u>Youth</u> WIOA Sec. 129(c)(2)(I), the WIN 0092, the TEGL 10-16, Change 1, and 20 CFR 681.580 provides for Follow-Up Career Services for all participants, as appropriate, for not less than 12 months after the completion of WIOA activities.

All <u>Youth</u> participants must be informed of follow-up at the time of enrollment to ensure they are prepared for the Follow-Up Career Service contact. After program completion Youth are to be offered an opportunity to receive Follow-Up Career Services that align with their individual service strategies (IPP).

To clarify, the phrase "follow-up" is in reference to two different actions for WIOA Adult, Dislocated Worker, and Youth. They are:

- A. Follow-Up Career Service which is provided to a participant when their training plan has completed, and they are no longer an active participant. This action requires the case manager to be in contact with the participant and advocate on their behalf. It is a service meant to support the participant once program participation has ended.
- B. Follow-up for the sole purpose of collecting information for reporting. This is a data collection action that provides an update on the status of employment, education, etc. for performance or reporting and is not considered a service.

II. <u>POLICY:</u>

Follow-Up Career Services provided to program completed WIOA Title I Adult, Dislocated Worker and <u>Youth</u> program participants may include monetary activities designed to help those individuals obtain unsubsidized employment, or for those placed in unsubsidized employment whose employment may be at risk due to interruptions to key supports.

Follow-Up Career Services must be provided for a period of up to 12 months (i.e., not more than 12 months). Note: WIOA law and regulations define Follow-Up Career Services as a type of career service, which would typically mean that they can only be provided to participants. However, the U.S. Department of Labor (DOL) has instructed states to follow the guidance issued in TEGL 10-16, Change 1, which states that Follow-Up Career Services begin after program completion.

The Follow-Up Plan for retention and wage progression will be developed for all participants exiting WIOA. The Follow-Up Career Services will be recorded in the current state provided database. The types of services provided, the duration of services and intensity of follow-up must be documented in the case file and determined based on the needs of the individual.

Follow-Up Career Services for program completed WIOA Title I program participants can include, but are not limited to, two-way exchanges between the service provider or case manager and either the individual (or his/her advocate) or the individual's employer as follows:

- Counseling individuals about the workplace.
- Contacting individuals or employers to verify employment.
- Contacting individuals or employers to help secure better paying jobs, additional career planning, and counseling for the individual.
- Assisting individuals and employers in resolving work-related problems.
- Connecting individuals to peer support groups.
- Providing individuals with information about additional educational or employment opportunities.
- Providing individuals with referrals to other community services.

Follow-up Career Services can also include supportive services. Support Service funds spent on participants during follow-up are under the same policy and procedures as the "during program" support service requirements (see Administrative Bulletin 217 Supportive Services).

Additionally, Follow-Up Career Services for Youth may also include:

- A. Adult mentoring,
- B. Financial literacy education,
- C. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- D. Activities that help Youth prepare for and transition to post-secondary education and training.

All program completions, exit and Follow-Up Career Services information is to be entered into the state provided database, printed out and placed in the exited file. In the quarters following exit, Follow-Up Career Services, employment and/or post-education (<u>Youth</u> only) information is entered into the state database, printed out and placed in the exited file.

Follow-Up Career Services do not trigger the exit date to change or delay exit for performance reporting as per guidance issued by DOL in TEGL 10-16, Change 1. As such, contractors must count each exit of a participant during a program year as a separate period of participation if a participant has more than one exit in that program year.

For Adult, Dislocated Worker and Youth Exclusions, see Admin Bulletin 221 Performance Indicators.

III. <u>ACTION REQUIRED:</u>

Contractors shall insure that appropriate documentation is maintained to justify the types and duration of Follow-Up Career Services provided to individual participants.

For every participant it is required to complete the Exit and Performance Form (Administrative Bulletin 219, Attachment 1 (Adult and Dislocated Worker) or Attachment 2 (Youth) of participants' status regarding employment and education/training (Youth only). At the time of exit this form is to assist in developing follow-up strategies to meet the needs of individuals after they exit the program and to ensure performance outcomes are on track. The Exit and Performance Form applies to every applicable exit and is required to be sent to the South Central Workforce (SCW) upon completion.

Follow-up shall begin the day of exit and be provided for a period of up to 12 months (365 days). For example, when a participant exits 4/1/19, the end date for follow-up services is 3/31/20. Initial follow-up entry (Exit quarter) must be the same as the exit date. Follow-up will be tracked within the state provided database for all quarters beginning with exit. This will require a total of 5 entries into the database. (Exit quarter follow-up entry, 1st quarter after exit, 2nd quarter after exit, 3rd quarter after exit and 4th quarter after exit.)

Along with these five entries, additional service entries may be entered when a service has been provided during the regular quarterly contact. If a service has not been provided you will still need a case note indicating the type of contact made and/or attempted with the participant. Again, you

will only need an additional quarterly entry into the state provided database if you have provided a service to the participant. If no service has been provided you will only have your five minimum required entries and contact case notes for the follow-up period. Attachment 1 Follow-Up Information Form is not required by the SCW but may be used by Contractors.

Follow-Up Participant Opt Out or Cannot be Located:

All WIOA Title I participants must receive Follow-Up Career Service for a minimum duration of 12 months (365 days) beginning at exit unless they opt out or after reasonable level of attempts cannot be located.

If a participant chooses to not receive Follow-Up Career Services and opts out for any reason Attachment 2 WIOA Opt-Out or Cannot be Located for Follow-Up Services Form must be completed with signatures. If a participant is unable to provide a signature, case notes must document why.

Additionally, it is recognized that there will be participants that cannot be located for Follow-Up Career Services. There must be **reasonable** amount of attempts with different methods of outreach documented before considering this option (combination of email, text, phone, employer visits, letter, etc.). Contractors are required to develop a policy defining their amount of attempts and effort. When this happens WIOA Opt-Out or Cannot be Located for Follow-Up Services Form must be completed, documented in case notes and placed in the file. It is also required to mail a letter to the participant's last known address stating due to their lack of communication they will no longer be provided Follow-Up Career Services. The letter must be placed in the participant's file. Follow-up entries are no longer required for the remaining quarters. If the participant is later reengaged into Follow-Up Career Services, from the point of reengagement and forward entries are required for each quarter.

Follow-up is extremely important to the SCW and WIOA Title I programs as it is the only way to track employment outcomes for exited participants in real time. For this reason, follow-up participant opt-out or cannot be located shall be conducted as an exception and not the rule. The number of opt-outs and cannot locates shall be tracked and reported in the service provider's quarterly Follow-Up Report.

Self-Employment Wage Data:

Although most employment will be identified through wage records, self-employment income is not tracked through the Unemployment Insurance System and therefore requires collection of supplemental wage documentation such as a profit and loss statement, quarterly state sales tax form or tax return.

Self-Employment requires that the employment goal in the state database be identified as "Self-Employment" and documentation that the participant is self-employed in the first, second, third and fourth quarters after exit as indicated on the Follow-Up Plan in the state provided database. A business license at exit is required if exited to self-employment.

Supplemental Wage Data:

Supplemental wage data is also permitted for the WIOA Title I Employment measures and for calculating the Median Earnings measure. All supplemental data must be documented and is subject to review. Case notes must refer to the documentation used such as administrative records, Revenue or Tax records, automated database systems, participant licenses, or business-related documentation. Copies of these documents are to be maintained on file for verification purposes. Please Reference TEGL 26-16 for a list of acceptable documentation.

Follow-Up Quarterly Report:

Contractors will perform participant follow-up and provide the SCW with a Quarterly Report on all follow-up participants with permanent unsubsidized employment information, including name of employer, job title if available, earned credential, hourly wage and 2nd quarter earnings on each participant; and/or post-secondary education or training for <u>Youth</u>. Any credential earned during follow-up must be submitted to the SCW. Quarterly Follow-Up Reports are due no later than the last calendar day of the following month.

QUARTER DATES:	REPORT DUE:
July, August, September	By October 31 st

October, November, December	By January 31 st
January, February, March	By April 30 th
April, May, June	By July 31 st

Attachment 1: Follow-Up Information Form (optional)

Attachment 2: WIOA Opt-Out or Cannot be Located for Follow-Up Services Form

REFERENCES:

All Contractors will be monitored for compliance with the MIS procedures for timeliness, accuracy and completeness of all forms and documents.

- 20 CFR § 680.150
- 20 CFR § 681.580
- TEGL 10-16, Change 2 Performance Accountability Guidance for WIOA
- TEGL 19-16 Guidance on Services Provided Through Adult and Dislocated Worker Programs
- TEGL 21-16, Change 1 WIOA Youth Program Guidance
- WorkSource System Policy 1020, Revision 1 Data Integrity and Performance Policy and Handbook
- WorkSource System Policy 5620, Revision 1 Follow-Up Services for Adult and Dislocated Worker