



PATHWAY HOME 6 PROGRAM EXIT & FOLLOW-UP

Policy Number: 265, Revision 2

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I. PURPOSE:

The purpose of this policy is to ensure that participants exiting the Pathways Home 6 program are appropriately transitioned out of active participation, and to define the follow-up procedures required to maintain post-release follow-up support for up to twelve (12) months. This policy will ensure that participant outcomes, including employment, earnings, and recidivism rates, are properly tracked and reported to comply with the Department of Labor (DOL) guidelines.

II. BACKGROUND:

Exit from a program, as set forth in 20 CFR § 677.150(c), 34 CFR § 361.150(c), and 34 CFR § 463.150(c), generally occurs when the participant has not received services for a specified period of time and has no additional services scheduled for 90 days.

Follow-Up Career Services does not extend the date of exit in performance reporting, as they can only occur after exit from the program. To clarify, the phrase “follow-up” is in reference to two different actions for WIOA programs. They are:

1. Follow-Up Career Service is provided to a participant when their training plan has been 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.
2. 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.

III. EXIT PROCESS:

The participant exit process should ensure that the individual is appropriately transitioned from active participation and that all necessary documentation is completed.

1. **Criteria for Exit:** A participant may exit the program when one or more of the following conditions are met:
 - a. **Completion of Services:** The participant has completed the planned program activities and has achieved the desired outcomes, such as employment or credential attainment.
 - b. **Voluntary Exit:** The participant has voluntarily chosen to exit the program before completing all planned activities.
 - c. **Involuntary Exit:** The participant is no longer able to participate due to incarceration or other extenuating circumstances
 - d. **Non-Engagement:** The participant has failed to engage with the program for more than 90 days without explanation, despite efforts to re-engage them.

2. **Exit Procedures:** Case managers are responsible for initiating and completing the following exit procedures:
 - a. **Review the Individual Development Plan (IDP):** Ensure that the IDP is up-to-date, and document any final services or milestones completed.
 - b. **Complete Exit Form:** Fill out the *Participant Exit Form*, see **SCW 260 Participant Exit Form Attachment 1**, which includes:
 - i. Exit Date
 - a. NOTE: *Each participant’s “Date of Program Exit” is the last date they received an active core program service, and it is auto-populated (filled in) by GPMS, except in rare circumstances. In normal circumstances, the date of exit cannot be determined until 90 days have elapsed since the participant last received any active core services. At that point, the date of exit is applied retroactively by GPMS.*
 - ii. Exit Reason
 - a. NOTE: *For exceptional circumstances (**exclusion reasons only**), users may determine the exit date in GPMS by clicking the “Exit Participant” button in the Exit Outcomes section.*
 - iii. Services provided leading up to the exit
 - a. NOTE: *Supportive services and follow-up services are not active core services and do not affect the date of exit. Follow-up services may begin immediately following the last date of a core service if it is expected that the participant will not receive any future core services.*
 - iv. Achieved outcomes (e.g. credential attainment, employment status)
 - c. **Collect Supporting Documentation:** Ensure that all necessary documentation (e.g., pay stubs, credentials) is collected and uploaded into the participant’s case file in GPMS.

- d. **Conduct Exit Interview:** If possible, conduct an exit interview with the participant to review their progress, post-exit plans, and any upcoming follow-up activities.
- e. **Record Exit in GPMS:** Enter the exit details and documentation into GPMS within fourteen (14) calendar days of the GPMS auto-populated exit, ensuring that all data fields are completed accurately.

IV. FOLLOW-UP SERVICES:

Follow-up services are designed to support participants in maintaining employment, achieving additional outcomes (e.g., further education or training), and preventing recidivism. Follow-Up services for program-completed participants can include, but are not limited to, two-way exchanges between the case manager and either the individual or his/her advocate. Case managers are required to provide follow-up services for a period of up to twelve (12) months post-release (i.e., not more than 12 months).

1. Follow-Up Services Provided:

- a. **Career Counseling:** Ongoing job search assistance, career planning, resume updates, and interview preparation.
- b. **Crisis Management:** Assistance with housing stability, mental health services, and addressing any other reentry barriers.
- c. **Referrals to Community Resources:** Providing referrals for supportive services (e.g., housing, childcare, substance abuse treatment) as needed.
- d. **Job Retention Support:** Providing job coaching and advice to help participants maintain employment.
- e. **Skill Advancement Opportunities:** Assistance with enrolling in additional training, certifications, or education programs to enhance career prospects.

2. Follow-Up Services Timelines:

- a. **First Month Post-Exit:** Case manager will contact the participant weekly for the first month after exit to check in on their progress, offer services, and document outcomes.
- b. **Months 2 – 12 Post Exit:** Depending on the individual needs of the participant, the case manager will contact the participant bi-weekly or monthly for months two (2) through twelve (12) after exit to provide support and track outcomes.
- c. **Crisis or Employment Change:** In the event of a crisis (e.g., job loss, housing instability) or if the participant secures new employment, more frequent follow-up may be necessary. The case manager will adjust the frequency of follow-up based on the participant's needs.

3. **Documentation of Follow-Up Services:** Case managers must document all follow-up interactions in the GPMS system to ensure compliance with performance reporting.
 - a. **Document Follow-Up Contact:** Record the date of contact, the type of services provided, and the participant's current status (employment, education, housing). See **SCW Participant Follow-up & After-Exit Performance Attachment 2**.
 - b. **Update Outcomes:** If there are changes in the participant's employment or educational status, update the GPMS to reflect the new information (e.g., new employer, change in job title, or wage increase).
 - c. **Capture Outcomes at Required Intervals:** Ensure that the required follow-up outcomes are reported at or before 90 days post-exit and then quarterly until twelve (12) months post-exit.

V. POST-EXIT OUTCOMES:

Post-exit outcomes are a critical part of performance reporting for the Pathways Home 6 program. These post-exit outcomes include employment status, earnings, credential attainment, and recidivism.

1. **Employment and Earnings:** Participant employment and earnings after exit during the twelve (12) month follow-up period.
 - a. **Data Collection:**
 - i. Case managers should collect employment verification (e.g., pay stubs, or employer verification) within thirty (30) days of employment. See **SCW Participant Follow-up & After-Exit Performance Attachment 2**.
 - b. **Reporting:**
 - i. Update GPMS with verified employment details, including employer name, job title, wage information, and employment start date.
 - ii. Report employment and earnings at the following intervals: second quarter after exit, fourth quarter after exit, and as part of ongoing follow-up documentation.
2. **Credential Attainment:** Participant credential attainment after exit during the twelve (12) month follow-up period.
 - a. **Data Collection:**
 - i. Ensure that participants who earned a recognized credential during the program or within one (1) year after exit have their credentials documented in the participant file and GPMS.
 - ii. Acceptable credentials include:
 1. Secondary school diploma or recognized equivalent

2. Associate degree
3. Bachelor's degree
4. Occupational licensure
5. Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
6. Occupational certification
7. Other recognized certificates of industry/occupational skills completion are sufficient to qualify for entry-level or advancement in employment.

b. Reporting:

- i. Update GPMS with the participant's credential attainment details.
- ii. Report credential attainment within the first year post-exit.

3. Recidivism Tracking: Participant recidivism data used to track whether participants are convicted of a new criminal offense within twelve (12) months of release.

a. Data Collection:

- i. All recidivism tracking activities must comply with SCW Policy 112 Personally Identifiable Information (PII) and require a valid Authorization for Release of Information (ROI).
- ii. Track whether participants are convicted of a new criminal offense within twelve (12) months of release. This data can be collected through self-attestation, WA State background checks, or coordination with the local justice system.
- iii. If a participant is not maintaining an active relationship with their case manager (e.g., failing to respond to outreach or attend scheduled meetings), a WA State background check will be conducted. Additionally, must coordinate with the Yakima or Chelan County Jail and review jail rosters to verify whether the participant has reentered the correctional system.
- iv. Case managers will document and record any criminal offenses, arrests, or incarcerations discovered through these methods and update the GPMS accordingly.
- v. GPMS case notes must exclude sensitive criminal justice details and reference such documentation using "See confidential file."

b. Reporting:

- i. All recidivism data, whether self-reported or discovered through background checks and jail records, will be tracked and reported in GPMS in compliance with DOL requirements.
- ii. Any new offenses or changes in participant status will be recorded in GPMS as part of the post-exit follow-up process.

VII. AUDITING AND MONITORING:

All Contractors will be monitored on an ongoing basis to ensure compliance with exit and follow-up procedures.

VI. VALIDATION REQUIREMENTS

Contractors will conduct an administrative review for timeliness, accuracy, and completeness of all forms and documents before submitting to SCW. The review will include all information entered into GPMS, such as the participant's program performance information, services, and supporting documentation uploaded for completeness and internal consistency.

Contractors are required to utilize **SCW 260 MIS Exit Transmittal Sheet Attachment 3** when notifying SCW of program exits completed in GPMS, within 14 calendar days.

VIII. ATTACHMENTS:

- Attachment 1 – Participant Exit Form
- Attachment 2 – SCW Participant Follow-up & After-Exit Performance
- Attachment 3 – MIS Exit Transmittal Sheet

IX. REFERENCES:

- SCW Policy 112 Personally Identifiable Information
- 20 CFR § 677.155
- TEGL 10-16, Change 3 – Performance Accountability Guidance for WIOA
- ETA REO Grant Performance Management System (GPMS) – Grantee User Guide
 - Refer to the GPMS user guide for data entry and reporting instructions