



## Workforce Innovation and Opportunity Act (WIOA) Policies and Procedures

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### Follow-up Services and Recording Performance Outcomes after Exit

**Policy Number: P-1009, Rev. 3**

**Revision Date: March 10, 2023**

**Supersedes:** Follow-up Services and Recording Performance Outcomes after Exit, Rev. 2 dated 1-14-22

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#### **PURPOSE**

The purpose of this policy is to communicate the requirements for providing follow-up services to individuals who have completed their participation in the Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth (Young Adult) programs and describes Department of Labor (DOL) performance reporting requirements during the 2<sup>nd</sup> and 4<sup>th</sup> quarters after program exit.

The purpose of this policy revision is to:

- Clarify the timeframes for providing follow-up services to individuals enrolled in the WIOA Title I Adult, Dislocated Worker, and Youth (Young Adult) programs.
- Correct an error in the previous policy related to young adults earning a GED or high school diploma while enrolled in the program and who enroll in a post-secondary education or training program that leads to a credential post-exit.
- Specify when performance reporting after exit is required and for whom performance reporting is exempt.

#### **BACKGROUND**

[WIOA](#) sections 134(c)(2)(xiii) and 129(c)(2)(I) describe follow-up service requirements for individuals who have completed the WIOA Title I Adult, Dislocated Worker, and Youth (Young Adult) programs. Department of Labor (DOL) [TEGLs 19-16](#) and [21-16](#), and Employment Security Department's (ESD) [Policy 5620, Rev. 1](#) provide additional guidance for the provision of follow-up services.

Follow-up services are defined as two-way exchanges between the WIOA Title I service provider and the individual (or the individual's advocate or employer) and are designed to provide support and guidance after program completion to ensure sustained employment, earning of post-secondary credentials, wage increases, and advancement of career goals. Follow-up services are above and beyond the act of contacting individuals for securing performance reporting documentation.

During the 2<sup>nd</sup> and 4<sup>th</sup> quarters of follow-up, WIOA Title I service providers must report the individual's employment wages, post-secondary credentials, or for WIOA Youth (Young Adult) program only, individuals who have enrolled in post-secondary education. For full DOL performance reporting requirements, see [TEGLs 10-16, Change 1](#) and [TEGL 14-18](#).

#### **POLICY**

Follow-up services may be provided immediately following the last date an individual receives a WIOA Title I career, individualized, or training service if it is expected that the individual will not receive any future services other than follow-up services. The types and the duration of follow-up services must be determined based on the needs of the individual and as outlined in this policy.

If an individual returns to the service provider requesting additional career, individualized, or training service

services within 90 days of completing the WIOA Title I program, the service provider should delete the program completion date recorded in ETO, cancel the follow-up services plan (if applicable), and record the applicable career, individualized, or training service in ETO.

Follow-up services must be recorded in ETO at the time service is provided. Case notes documenting the provision of follow-up services and outcomes of those services must be recorded in the applicable follow-up service touch point recorded in ETO. Case notes must be entered as soon as the information is obtained and/or when services are provided. Instructions for uploading documents related to the provision of follow-up services are in WorkForce Central's ETO Data Validation and Documentation Policy located on [WorkForce Central's Policy Library](#).

WIOA Title I service providers must facilitate follow-up services and report performance outcomes as described in this policy and in WorkForce Central's ETO Data Validation and Documentation policy located on [WorkForce Central's Policy Library](#).

## **Adult and Dislocated Worker Programs**

Follow-up services are available to individuals enrolled in WIOA Title I Adult or Dislocated Worker programs who have attained their employment and training goals outlined on their Individualized Employment Plan (IEP), entered unsubsidized employment that leads to self-sufficiency, including self-employment, and when no other WIOA Title I services are needed or planned. A program completion date must be recorded in the State's Management Information System (MIS) commonly referred to as, "ETO" prior to the provision of follow-up services.

Follow-up services for individuals enrolled in WIOA Title I Adult or Dislocated Worker programs must be provided for a maximum of 12-months. The 12-month follow-up requirement is completed one year from the date of exit.

Follow-up services for adults and dislocated workers are listed in [ESD's WorkSource Services Catalog](#) and can include, but are not limited to:

- Counseling individuals about the workplace.
- Contacting individuals or employers to help secure better paying jobs, to provide 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 referral to other community services.
- Supportive services to help individuals retain unsubsidized employment or continue post-secondary education that may be at risk due to interruptions to key supports. See WorkForce Central's Supportive Service policy for details located on [WorkForce Central's Policy Library](#).

Unless an individual declines to receive follow-up services, WIOA Title I service providers must document the individual's follow-up progress/status update in case notes recorded in ETO on a minimum quarterly basis.

If an individual opts out of receiving follow-up services, the date they opted out and their reason for opting out must be documented in case notes recorded in ETO.

If 90 or more days have passed since a program completion date was recorded in ETO and the individual requests additional services that are above and beyond allowable follow-up services for the WIOA Title I Adult and Dislocated Worker programs, the service provider must first discuss the request for additional services with the WorkForce Central contract manager.

## Youth (Young Adult) Program

Follow-up services are available to young adults enrolled in WIOA Title I Youth (Young Adult) program when no other WIOA Title I services are needed or planned. A program completion date must be recorded in the State's Management Information System (MIS) commonly referred to as, "ETO" prior to the provision of follow-up services.

Follow-up services for young adults must be provided for a minimum of 12 months. The 12-month follow-up requirement is completed one year from the date of exit. Young adults may receive follow-up services beyond the 12-month requirement at the discretion of the service provider. Duration and type of follow-up services must be determined based on the unique needs of each individual.

At the time of enrollment into the WIOA Title I Youth (Young Adult) program, young adults must be informed of the availability of follow-up services for a minimum of 12 months following the completion of their program. The service provider must clearly document that this follow-up notification occurred in the program enrollment case notes recorded in ETO.

Follow-up services for young adults are listed in [ESD's WorkSource Services Catalog](#) and can include, but are not limited:

- Counseling individuals about the workplace.
- Supportive services.
- Adult mentoring.
- Financial literacy.
- 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.
- Activities that help youth prepare for and transition to post-secondary education and training.

Follow-up services after program completion are critical for young adults and are provided as needed to ensure they are successful in retaining or regaining employment after program completion or to assist with remaining enrolled in or enrolling into post-secondary education after program completion. Services provided during follow-up must align with the youth's Individual Service Strategy (ISS) as documented on a paper ISS uploaded into ETO or in case notes recorded in ETO.

Unless the young adult declines to receive follow-up services, WIOA Title I service providers must document the young adult's follow-up progress/status update in case notes recorded in ETO on a minimum quarterly basis.

Young adults may decline to receive follow-up services, and in some situations the young adult cannot be located or contacted after program completion. If the young adult declines to receive follow-up services, the date and reason they declined follow-up services must be documented in case notes recorded in ETO. If a young adult cannot be located or contacted after program completion, the dates and outcome of attempts to contact the young adult must be documented in case notes recorded in ETO. The service provider may discontinue attempting to contact individuals who have not responded after the first quarter following program completion. The decision to discontinue attempting to contact young adults post-program completion must also be documented in case notes recorded in ETO.

If 90 or more days have passed since a program completion date was recorded in ETO and the young adult requests additional services that are above and beyond allowable follow-up services for the WIOA Title I Youth (Young Adult) program, the service provider must first discuss the request for additional services with the WorkForce Central contract manager.

## **Program Completion and Follow-Up Service Documentation Requirements**

Service Providers must collect documented evidence of individuals' employment and/or training status at program completion. Procedures for uploading documents used to validate employment and training status at program completion are in WorkForce Central's ETO Data Validation and Documentation Policy located at [WorkForce Central's Policy Library](#).

A case note must be recorded in the Program Completion touch point in ETO. The program completion case note must include:

- A synopsis of the individual's engagement in the program including a brief description of the services planned at program enrollment, summary of services received, and outcomes of those services.
- Date and reason for program completion. The date of program completion recorded in case notes must match the program completion date recorded in ETO.
- School status at program completion (WIOA Title I Youth program only).
- Types and duration of planned follow-up services, if applicable
- Date and reason the individual opted out of receiving follow-up services, if applicable.

For Young Adults who exit the program and are enrolled in a post-secondary education or training program that leads to a credential post-exit, the following must be recorded in the program completion case note (if not previously documented in case notes prior to program completion):

- Date enrolled in post-secondary training,
- Name of school,
- Training program,
- Anticipated completion date, and
- Anticipated credential to be earned.
- Future dates and methods to collect training status and outcomes (including credentials earned) in the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit.

For any individual completing their program due to obtaining unsubsidized employment, the following must be recorded in the program completion case note recorded in the program completion touchpoint in ETO:

- Name of employer,
- Job title,
- Wage,
- Full- or part-time employment status,
- Start date of employment, and
- Whether the employment is on a pathway to meeting the individual's self-sufficiency needs or is comparable to previous employment, when applicable.
- Future dates and methods to collect employment status and wages in the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit.

For any other reasons for program completions, the reason for concluding the individual's participation in the program must be recorded in the program completion case note recorded in ETO.

## **Performance Reporting After Exit**

WIOA Title I service providers must ensure the accurate and timely reporting of the following

performance measures in ETO during the four (4) quarters after an individual is system exited from ETO. Individuals who program exit due the following circumstances are excluded from DOL performance reporting:

- Incarceration or institutional care
- Medical condition that will prevent participation in services for longer than 90 days
- Deceased
- Reserve military or National Guard called to active duty
- Youth only: Receiving foster care services and moved out of Pierce County

Directions for uploading source documentation and recording performance outcomes in ETO are in WorkForce Central’s ETO Data Validation and Documentation Policy located at [WorkForce Central’s Policy Library](#).

Example Reporting Quarters: The following table provides an illustration of when the reportable “four quarters after exit” begins for an individual who received their last participation-level service on December 3, 2021:

Exit Quarter (Exit date 12/3/21)	1 <sup>st</sup> Quarter After Exit	2 <sup>nd</sup> Quarter After Exit	3 <sup>rd</sup> Quarter After Exit	4 <sup>th</sup> Quarter After Exit
October-December 2021	January-March 2022	April -June 2022 Reportable Quarter	July-September 2022	October-December 2022 Reportable Quarter

- a. Entered unsubsidized employment or enrolled in training (WIOA Title I young adults only) during the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit:** Defined as the percentage of individuals who are in unsubsidized employment during the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit. For the WIOA Title I Youth (Young Adults) program only, this indicator includes young adults actively enrolled in education or training activities in addition to those who obtained unsubsidized employment 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit.

If employment is related to training the individual received while enrolled in the WIOA Title I program, service providers must indicate this in ETO as prescribed in WorkForce Central’s ETO Data Validation and Documentation Policy.

Individuals are not required to provide evidence of continued, uninterrupted employment or training during the entire 12 months after exit. Rather, DOL performance reporting requirements limit the verification of an individual’s employment or training status to any time during the 2<sup>nd</sup> and 4<sup>th</sup> quarter after exit. (WIOA Joint Rule, Departments’ responses: Page 55841)

- b. Credentials earned 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit,** defined as the percentage of participants enrolled in an education or training program (excluding those in on-the-job training and customized raining) who obtained a recognized post-secondary credential or secondary school diploma, or its recognized equivalent, during participation in or within one (1) year after exit from the program.

Note: A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant is also employed or is enrolled in an education or training program leading to a recognized post-secondary credential within one (1) year after exit from the program.

The following are reportable credentials:

- Secondary school diploma or its equivalency
- AA or AS diploma/degree
- BA or BS diploma/degree
- Occupational licensure

- Occupational certification
- Other recognized diploma, degree, or certificate

The optimal time to collect employment and wage information, and training information for young adults, is any time during the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit or as soon as possible following the close of the 2<sup>nd</sup> and 4<sup>th</sup> full quarters after exit. Credentials earned may be collected at any time during the 12 months after exit.

As a result, verifying these performance indicators requires a full 12 months of follow-up engagement. Service providers are encouraged to inform individuals during the WIOA Title I program enrollment process, and on an ongoing basis throughout the individual's engagement in the program, that they will be asked to periodically submit source documentation after they exit the program, or with their written permission, have it collected directly from their employers. Individuals should be informed and reminded that the service provider is required to report the individual's employment (including wages), or for young adults, verification of their training status, during the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exiting, and to report credentials earned when they occur at any time during the four (4) quarters after exit.

Service providers are encouraged to develop a follow-up communication plan with the individual who is exiting the program. The plan should include current, and back-up contact information for both parties (e.g., phone numbers, email addresses, mailing addresses), anticipated dates (i.e., future months) the source documentation will need to be submitted to the service provider, and the anticipated timeframe when the service provider will contact the individual to request the documentation, if the individual has not already submitted it to the service provider. The plan should also include the service provider's procedures for contacting the individual or their employer and the documentation the service provider is required to collect for federal reporting purposes.

Individuals are encouraged to provide the service provider with their new mailing address, phone numbers, or other updated contact information as it changes. Service providers are encouraged to develop procedures to update this information periodically while the individual remains enrolled in the program.

While developing the follow-up communications plan, service providers may consider offering the individual the option for the service provider to contact the individual's employer on the individual's behalf to collect employment verification. If the individual consents to this option, the service provider must have a signed authorization to release information form allowing the service provider to contact the individual's employer and authorizing the employer to release the individual's employment status to the service provider. The authorization to share information form should include a request that the employer share at minimum, but not limited to the individual's start date, job title, and wage. Signed authorization forms must be uploaded in the Uploaded Files touchpoint in ETO.

Service providers are encouraged to maintain on-going and frequent communications with individuals who have exited the program and with those that may not be in an active follow-up plan. The frequency of these on-going communications is at the discretion of the service provider and individual, but monthly contacts are encouraged. The DOL encourages minimal lag time between when an individual exits a WIOA Title I program and the first follow-up contact. DOL has found that the longer a service provider waits to contact an individual who has exited the program, the greater likelihood of a lower response rate which could result in less valid data or an inability to secure source documentation.

In the event the service provider is unable to contact the individual and unable to collect required source documentation, the efforts made to collect the documentation must be recorded in standalone case notes entered into ETO.

## REFERENCES

### Adult/DW:

- WIOA sec. 134(c)(2)(A)(xiii)
- 20 CFR 678.430(c) and 20 CFR 680.150
- TEGL 10-16, Change 1
- TEGL 16-16
- TEGL 19-16
- ESD WIN 0077, Rev. 10
- ESD WIN 0082, Rev. 1
- ESD WIOA Policy 5620, Rev. 1

### Youth:

- WIOA Sec. 129(c)(2)(I)
- 20 CFR 681.580
- TEGL 10-16, Change 1
- TEGL 21-16
- ESD WIN 0077, Rev. 11
- ESD WIN 0082, Rev. 1
- ESD WIN 0084, Rev. 1
- ESD WIN 0092

## APPROVED



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Katie Condit (Mar 10, 2023 10:44 PST)

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Katie Condit, WorkForce Central CEO

Date