



WIOA Title I Program Policies

Follow-up Services & Recording Performance Outcomes After Exit

POLICY #:	<i>P-WIOA-1009, Rev. 5</i>
EFFECTIVE:	<i>August 7, 2025</i>
SUPERSEDES:	<i>Follow-up Services and Recording Performance Outcomes after Exit, Rev. 4, dated 4-26-24</i>

PURPOSE:

The purpose of this policy is to communicate the requirements of 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 2nd and 4th quarters after program exit.

This policy was revised to:

- Require follow-up services to all positively exited WIOA Title I participants.
- Remove requirement for service providers to collect documented evidence of program recipient's employment and/or training status at program completion.
- Include non-substantial edits for clarity.

BACKGROUND:

WIOA sections 134(c)(2)(xii) 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) TEGs [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 2nd and 4th quarters of follow-up, WIOA Title I service providers must report the individual's employment wages, post-secondary credentials, or for the WIOA Title I Youth (Young Adult) program only, young adults who have enrolled in post-secondary education. For the full DOL performance reporting requirements, see TEGLs [10-16, Change 2](#), and [TEGL 14-18](#).

POLICY:

Follow-up services must be provided to all participants immediately following the last date an individual receives a WIOA Title I career, individualized, or training service if it expected the individual will not receive any future services other than follow-up services. The types and 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 WIOA Title I service provider requesting additional career, individualized, or training services within 90 days of completing the WIOA Title I program, the service provider should delete the program completion date recorded in the State's management information system (MIS), commonly referred to "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 the 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 touchpoint 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 Adult and Dislocated Worker Programs

Follow-up services are required for 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 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 12 months. The 12-month follow-up requirement is completed one year from the date of program exit.

Follow-up services (*two-way exchanges between the service provider and the individual, or their advocate, or the individuals' employer*) for adults and dislocated workers are listed in ESD's WorkSource [Services Catalog](#) and can include, but are not limited to:

- Workplace counseling.
- Assistance with securing better paying jobs.
- Provide additional career planning.
- Assistance with resolving work-related problems.
- Connections to peer support groups.
- Providing additional employment or educational opportunities.
- Providing referrals to community services.
- Supportive services.

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

If an individual opts out of receiving follow-up services, the date they option 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 WIOA Title I Adult and Dislocated follow-up services, the service provider must first discuss the request for additional services with the WorkForce Central contract manger.

WIOA Title I Youth (Young Adult) Program

Follow-up services (*two-way exchanges between the service provider and the individual, or their advocate, or the individuals' employer*) are required for young adults enrolled in the 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 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 young adult.

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 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 to:

- Workplace counseling.
- 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 or 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 enrollment in or transitioning into post-secondary education. Services provided during follow-up must align with the young adult'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 follow-up services, WIOA Title I service providers must document the young adult's follow-up progress/status updates in case notes recorded in ETO on a minimum quarterly basis.

Young adults may decline to receive follow-up services, and in some situations cannot be located after program completion. If the young adult declines follow-up services, the date and reason they decline follow-up services must be documented in case notes recorded in ETO. If contact is lost after program completion, the dates and outcomes of attempts to contact the young adult must be documented in case notes recorded in ETO. The WIOA Title I service provider may discontinue attempting to contact young adults 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 days or more have passed since a program completion date was recorded in ETO and the young adult requests additional services that are above and beyond allowable WIOA Title I Youth (Young Adult) follow-up services, the WIOA Title I service provider must first discuss the request for additional services with the WorkForce Central contract manager.

Program Completion and Follow-up Service Documentation Requirements

WIOA Title I service providers must record a program completion case note at program completion. Procedures for case noting and uploading required source documentation at program completion are in WorkForce Central's ETO Data Validation and Documentation Policy located on WorkForce Central's [Policy Library](#).

Performance Reporting After Exit

Individuals who program exit due to the following circumstances are excluded from DOL performance reporting:

- Incarceration or institutional care
- Medical treatment expected to last more than 90 days
- Reserve military called to active duty
- Youth in foster care who moved out of the area (WIOA Title I Youth-Young Adults only)

WIOA Title I service providers must ensure accurate and timely reporting of the following performance measures in ETO during the four (4) quarters following an individual's system exit from ETO. Directions for uploading required source documentation and recording performance outcomes in ETO are in WorkForce Central's ETO Data Validation and Documentation Policy located on WorkForce Central's [Policy Library](#).

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

When applicable, record in ETO if employment is related to training the individual received while enrolled in the WIOA Title I program.

Service providers are not required to collect 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 2nd and 4th quarters after exit (WIOA Joint Rule, Department's response, page 55841).

- **Credentials earned during the 2nd and 4th 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 training) who obtained a recognized post-secondary credential or secondary school diploma (or its equivalent), during participation in or within one (1) year after program exit.

Note: An individual 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 individual is also employed or enrolled in an education or training program leading to a recognized post-secondary credential within one (1) year after program exit.

Reportable credentials include:

- Credential consisting of an industry-recognized certificate or certification
- Certificate of completion of an apprenticeship
- License recognized by the State involved or Federal government
- Associate or baccalaureate degree

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

Example Reporting Quarters

The following table provides an illustration of when the reportable four (4) quarters after exit begins for an individual who received their last participation level service on December 3, 2023:

Exit Quarter (exit date 12/3/25)	1 st Quarter after Exit	2 nd Quarter after Exit <i>*Reportable Quarter</i>	3 rd Quarter after Exit	4 th Quarter after Exit <i>*Reportable Quarter</i>
October-December 2025	January-March 2026	April-June 2026	July-September 2026	October-December 2026

Verifying performance indicators requires a full 12 months of follow-up engagement. As provided in [TEGL 26-16, Change 1](#), service providers are encouraged to inform participants during their WIOA Title I program enrollment process and on an ongoing basis throughout their program engagement that they will be asked to periodically submit source documentation after they program exit, 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 their employment including wages, and for young adults verification of their training status, during the 2nd and 4th quarters after exit and to report credentials earned at any time during the four (4) quarters after program exit.

To assist with the collection of required source documentation after program exit, WIOA Title I service providers are encouraged to develop a follow-up communication plan with participants as

they are completing their 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 necessary documentation if the individual has not already submitted it to the 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. To ensure seamless communication after program exit, both parties are encouraged to share updated contact information as it changes.

An option for collecting employment information is for the WIOA Title I service provider to contact the individual's employer on their behalf. If the individual consents to this option, the service provider must receive a signed "authorization to release information form" from the individual allowing the service provider to contact the employer and authorizing the employer to release the individual's employment status to the service provider. The authorization to share information form should include at a minimum the individual's start date, job title, and wage.

WIOA Title I service providers are required to maintain ongoing and frequent communication with individuals who have program exited. DOL encourages minimal lag time between when an individual program exits and the first follow-up contact. DOL has found that the longer a service provider waits to contact an individual, the greater likelihood of a lower response rate which could result in less valid data or an inability to secure necessary source documentation.

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

REFERENCES

Adult and Dislocated Worker

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



Youth (Young Adult)

- WIOA Sec. 129(c)(2)(I)
- 20 CFR 681.580
- TEGL 10-16, Change 1
- TEGL 21-16
- ESD WIN 0077 (current revision)

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