




CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 22-08

Effective Date: October 1, 2022

To: CWP Staff and Subrecipient Staff
From: Julie Watson, Compliance & Accountability Administrator
Issue Date: August 30, 2022 
Subject: WIOA Adult and DW Programs Follow-up Services and Data Collection Policy

With this transmittal, CWP is issuing policy and procedures for the provision of Follow-up Services to participants of WIOA Adult and Dislocated Worker (DW) programs who are placed in unsubsidized employment. These policies also include instructions for following up with all participants who exit the WIOA Adult and DW programs in order to obtain post-exit performance data. In addition to being attached to this transmittal, these policies can be found as policy numbers 3-70 and 4-70 of the CWP online policy and procedures manual at <https://capitalworkforce.org/policies/>.

Questions regarding CWP's Follow-up Services and Data Collection policy and procedures should be addressed to Shelly Henderson, CWP's One-Stop Services Manager, at SHenderson@capitalworkforce.org.

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A. Background: Follow-up Services is one of the three types of WIOA-defined career services provided to WIOA-eligible adults and dislocated workers. WIOA 20 CFR Section 680.150(c) requires that Follow-up Services be made available to WIOA Adult and Dislocated Worker (DW) program participants who are placed in unsubsidized employment, for a minimum of twelve (12) months following the first day of employment. Additionally, TEGL 10-16 requires that “follow-up” performance data of all WIOA Adult and DW program participants who have exited the program (see section C.3 for exceptions) be obtained and reported for a minimum of twelve (12) months following exit.

B. Definitions

Exit: As defined by WIOA regulations section 677.150(c), the exit date is the last date of service with no plans to provide the participant with future services. The exit date is determined only after ninety (90) days have elapsed since the participant last received services. For purposes of determining the exit date, self-service, information-only activities, or Follow-up Services are not considered services that would delay the onset of the 90 days.

Follow-up Data Collection: As required by WIOA Section 116 and TEGL 10-16, “follow-up” data collection and reporting on employment, wages, education and/or training and credential attainment of all program participants who exited the Adult or DW programs is required quarterly for up to twelve (12) months post-exit.

Follow-up Service: As defined in WIOA regulations Section 678.430(c), Follow-up Services is the offering and/or providing of employment retention services such as counseling about the workplace to participants who are placed in unsubsidized employment to help them retain and/or advance in that employment. Follow-up Services are offered and/or provided for up to twelve (12) months after program “close-out” following the first day of employment.

C. Policy

1. Follow-up Services

The Follow-up Services are provided to WIOA Adult and DW participants who are placed in unsubsidized Employment. Follow-up Services are provided as described in sections a.-e. below.

- a. Follow-up Services are offered and provided, as necessary, by contacting participants who have been placed in unsubsidized employment, assessing their employment retention needs and offering support to help them retain or advance in their job.
- b. Contacts may be accomplished in a variety of methods including but not limited to in person conversations if the participant comes to the office, telephone calls, emails, texts or any other practical means most effective at reaching the participant.
- c. Follow-up Services are initially offered within the first 30 days following program close-out due to unsubsidized employment.
- d. Follow-up Services are offered again between 30 and 60 days and between 60 and 90 days after the program close-out date and then at least once per calendar quarter for the following twelve (12) months.
- e. Follow-up Services include, but are not limited to:
 - i. Counseling about the workplace
 - ii. Additional career planning
 - iii. Contact with the participant’s employer to assist with work-related problems
 - iv. Peer support groups

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- v. Information about education and/or training opportunities
- vi. Referral to supportive services in the community.
- f. Follow-up Services are documented in the DOL case management/data system.

2. Follow-up Data Collection

For WIOA program performance reporting purposes, post-exit follow-up data are obtained and recorded on all Adult and DW participants who have exited the program.

- a. The following WIOA performance data elements are collected for all WIOA Adult or DW program participants who have exited the program regardless of the reason for the exit (including those who exit for reasons other than unsubsidized employment):
 - i. employment status,
 - ii. wage data,
 - iii. education and/or training completion status and
 - iv. credential attainment.
- b. Follow-up efforts to obtain performance data are conducted at least once per quarter for the 12-month period following the participant's exit date. The quarter for collecting follow-up data is determined by the quarter in which the date of exit occurs.

For example: If the date of exit is between January 1 and March 31, the first quarter after exit is April 1 through June 30. Program provider staff reach out to obtain performance data at least once per quarter for twelve (12) months starting with the April-June quarter.

- c. Performance data is documented in the DOL case management/data system.

3. Exceptions to the Provision of Follow-up Services and Follow-up Data Policy (TEGL 10-16 Attachment 2)

The following participants are not offered Follow-up Services and it is not necessary to continue to contact the participant quarterly to obtain performance data.

- a. The participant exits the program because they have become incarcerated in a correctional institution or have become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant.
- b. The participant exits the program because of medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- c. The participant is deceased.
- d. The participant exits the program because they are a member of the National Guard or the reserve military unit of the armed forces and are called to active duty for at least 90 days.

D. Procedures

- 1. Providing Follow-up Services (for participants placed in unsubsidized employment)
 - a. Program provider staff offer and/or provide Follow-up Services by contacting the participants, assessing their employment retention needs and offering support to help them retain or advance in their job. Services offered will vary depending on the participant's need.
 - b. Contacts are accomplished by a variety of methods including but not limited to in person conversations if the participant comes to the office, telephone calls, emails, texts or any

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- other practical means most effective at reaching the participant.
- c. Program provider staff offer and/or provide Follow-up Services:
 - i. Within the first 30 days following program close-out due to unsubsidized employment
 - ii. Between 30 and 60 days after the program close-out date
 - iii. Between 60 and 90 days after the program close-out date and
 - iv. At least once per calendar quarter for the following twelve (12) months.
 - d. Follow-up Services may include but are not limited to:
 - i. Counseling about the workplace
 - ii. Additional career planning
 - iii. Contact with the participant's employer to assist with work-related problems
 - iv. Peer support groups
 - v. Information about education and/or training opportunities
 - vi. Referral to supportive services in the community.
 - e. WIOA-funded supportive services are not allowable post-exit, therefore, are **not** provided as a Follow-up Service.
 - f. The Follow-up Service activity and case notes documenting the Follow-up Services activity are created in the DOL case management/data system.
2. Collecting and Documenting "follow-up" Data (for all participants who exit Adult & DW programs)
- a. Program provider staff obtain follow-up performance data on the participant's employment status, wages, education and training enrollment and completion and credential attainment.
 - b. Efforts to obtain performance data are made at least once per quarter for the 12-month period following the participant's exit date.
 - c. Methods of obtaining performance data include contacting participants, their employers, and/or their education and training providers; and/or utilizing available electronic databases.
 - d. Documentation of efforts to obtain performance data is recorded by the completion of a follow-up form and case note in DOL's case management/data system, and if applicable, uploading documentation to validate the data. [TEGL 07-18 Attachment I]
 - i. Documentation of employment status and wages includes:
 - a) Pay check stubs
 - b) Tax records, W2 form
 - c) Wage record match
 - d) Quarterly tax payment forms, such as an IRS form 941
 - e) Document from employer on company letterhead attesting to an individual's employment status and earnings
 - f) Self-employment worksheets signed and attested to by program participants
 - g) Detailed case notes confirming verbal verification by employer and signed by the program provider staff. Detailed case notes are to include the following information:
 - 1) Name and title of the employer staff that verified the employment information
 - 2) Date of contact with employer staff
 - 3) Dates of employment (hire date and last date of employment, if applicable)
 - 4) Pay rate
 - ii. Documentation of education and/or training enrollment

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- a) Copy of enrollment record
- b) File documentation with notes from program staff
- c) School records
- d) Transcript or report card
- e) Data match with postsecondary data system
- iii. Credential attainment
 - a) Copy of credential
 - b) Copy of school transcript
 - c) Case notes documenting information obtained from education or training provider. Case notes are to include the following information:
 - 1) Name and title of the education or training provider staff that provided the education or training information
 - 2) Date of contact with education or training provider staff
 - 3) Dates of education or training activity (beginning and end date, if applicable)
 - 4) Title of credential earned
3. Exited-Participant Requests Not to Be Contacted

If during the twelve (12) months of offering Follow-up services and reaching out to obtain follow-up data, an exited-participant requests not to be contacted, provider program staff take the following steps.

 - a. Review the benefits of allowing for Follow-up Services with the participant
 - b. Ensure that the participant knows how to contact the program staff in the event the participant changes their mind or employment circumstances change
 - c. Document the participant's request in the DOL's case management/data system with a case note including the following details: the date of the request, the reason for the request and a summary of the information provided to the participant.
 - d. For the remainder of the 12-month follow-up period the participant is not contacted to offer Follow-up Services or request follow-up data for performance reporting.
 - e. Follow-up data for performance reporting is still pursued through all other applicable, third-party means. As applicable, follow-up data may be obtained by third-party employment and wage record databases, and if allowable and appropriate, contacts with employers and education and training providers.
 - f. Employers and education and training providers should only be contacted regarding a post-exit participant's status if the participant gave permission or if there is an established program relationship with the employer and education and training provider that allows for the sharing of information on the participant's employment or credential attainment status.
4. Impact of Re-enrollment on Follow-up Data Collection (TEGL 10-16)

If during the 12-month follow-up data collection period, the participant re-enrolls in the WIOA Adult or DW program, efforts to collect quarterly performance data for the initial program participation period continue until the initial 12-month follow-up period ends. Re-enrollment in WIOA Adult and DW program starts a new, separate participation period. When the participant exits the new program participation period, a new 12-month follow-up period of quarterly data collection starts.

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3. Exited-Participant Requests Not to Be Contacted
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4. Impact of Re-enrollment on Follow-up Data Collection (TEGL 10-16)
- If during the 12-month follow-up data collection period, the participant re-enrolls in the WIOA Adult or DW program, efforts to collect quarterly performance data for the initial program participation period continue until the initial 12-month follow-up period ends. Re-enrollment in WIOA Adult and DW program starts a new, separate participation period. When the participant exits the new program participation period, a new 12-month follow-up period of quarterly data collection starts.