



CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 22-12

Effective Date: November 1, 2022

To: CWP Staff and Subrecipient Staff

From: Sandy Mackie, Program & Operations Administrator *Sandy Mackie*

Issue Date: October 25, 2022

Subject: WIOA Youth Program 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 the WIOA Youth program. These policies also include instructions for following up with all participants in order to obtain post-exit performance data. In addition to being attached to this transmittal, these policies can be found as policy number 5-70 in Section 5 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 Angelica Heron, CWP's Youth Services Manager, at aheron@capitalworkforce.org.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-70	Page 1
Subject: Follow-Up Services & Data Collection	Effective Date: 11/1/22	

A. Background: Follow-up Services are one of the three types of WIOA-defined career services provided to WIOA-eligible youth. WIOA 20 CFR Section 680.580 requires that Follow-up Services be provided to all WIOA Youth program participants who exit from the program to help ensure that each youth is successful in employment and/or postsecondary education and training. Follow-up Services must be provided for a minimum of twelve (12) months following the exit date. Additionally, TEGL 10-16 requires that “follow-up” performance data of all WIOA Youth 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 WIOA Youth program is required quarterly for up to twelve (12) months post-exit.

Follow-up Service: As defined in WIOA regulations Section 680.580(a), Follow-up Services are critical services provided following a youth’s exit from the WIOA Youth program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services align with the participant’s Individual Service Strategy and may include regular contact with a youth participant’s employer, including assistance in addressing work-related problems. Follow-up Services are provided for a minimum of twelve (12) months unless the participant declines to receive follow-up services or cannot be located or contacted. Follow-up services must include more than a contact to obtain follow-up data collection for performance reporting purposes.

C. Policy

1. Follow-up Services

- a. Follow-up Services are provided to all WIOA Youth program participants who exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up Services for youth may include the following elements:
 - i. Supportive services
 - ii. Regular contact with a youth participant’s employer, including assistance in addressing work-related problems
 - iii. Adult mentoring
 - iv. Financial literacy education
 - v. Provision of 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
 - vi. Activities that help youth prepare for and transition to postsecondary education and training

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-70	Page 2
Subject: Follow-Up Services & Data Collection	Effective Date: 11/1/22	

- b. Follow-up services may vary with the needs of the individual participant. Follow-up services align with the participant's Individual Service Strategy.
- c. Follow-up Services are provided for a minimum of twelve (12) months unless the participant declines to receive follow-up services or cannot be located or contacted.
- d. Follow-up Services may be provided beyond 12 months at the provider's discretion.
- e. Follow-up Services are initially offered after the program close-out is created in CTHires.
- f. 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.
- g. Follow-up Services are offered as needed but no less frequently than monthly for the first the twelve (12) months following program close-out. For participants who do not respond to follow-up contacts, monthly communication continues with at least two (2) attempts per month to contact the participant.
- h. 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 WIOA Youth participants who have exited the program.

- a. The following post-exit follow-up data are obtained and recorded on all WIOA Youth participants who have exited the program.
 - 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, Table B)

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

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-70	Page 3
Subject: Follow-Up Services & Data Collection	Effective Date: 11/1/22	

- reserve military unit of the armed forces and are called to active duty for at least 90 days.
- e. The participant is in the foster care system as defined in 45 CFR 1355.20(a) and exits the program because the participant has moved from the local workforce area as part of such a program or system.

D. Procedures

1. Providing Follow-up Services
 - 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 or be successful in postsecondary education and training.
 - b. The type of services offered, and the frequency of contact are determined based on the needs of the individual and therefore may differ with each participant.
 - c. Minimum frequency of outreach to offer and/or provide Follow-up Services:
 - i. Monthly during the 12-month follow-up period following program close-out
 - ii. For participants who do not respond to follow-up contacts, monthly communication continues with at least two (2) attempts per month to contact the participant.
 - d. 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 other practical means most effective at reaching the participant.
 - e. Follow-up Services may include but are not limited to:
 - i. Supportive services
 - ii. Counseling about the workplace
 - iii. Regular contact with a youth participant's employer, including assistance in addressing work-related problems
 - iv. Adult mentoring
 - v. Peer support groups
 - vi. Financial literacy education
 - vii. Provision of 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
 - viii. Information about education and/or training opportunities
 - ix. Activities that help youth prepare for and transition to postsecondary education and training
 - x. Referral to supportive services in the community
 - 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
 - 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,

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-70	Page 4
Subject: Follow-Up Services & Data Collection	Effective Date: 11/1/22	

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
 - 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 post-secondary 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 training or 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-

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-70	Page 5
Subject: Follow-Up Services & Data Collection	Effective Date: 11/1/22	

- 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 a WIOA Youth 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 a WIOA Youth 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.