PY 2019 LOWCOUNTRY WORKFORCE INSTRUCTION NUMBER 10

TO: Lowcountry Workforce Innovation and Opportunity Act (WIOA) Contractors/Service Providers/Sub-recipients/One-Stops

ISSUANCE DATE: November 13, 2019

EFFECTIVE DATE: July 1, 2019

REVISED EFFECTIVE DATE: N/A

SUBJECT: WIOA Follow Up Services for Adults, Dislocated Workers and Youth

EXPIRATION DATE: Indefinite

PURPOSE:
The purpose of this policy is to communicate local policy regarding activities that constitute follow up services for Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker and Youth program exiters. The goal of follow-up services is to ensure Placement, retention, wage gains and career progress for participants. Follow-up services provided to system-exited WIOA Title I Adult and Dislocated Worker program participants are non-monetary activities designed to help those individuals retain the unsubsidized employment resulting from the system-related services received.

REFERENCES:
- Workforce Innovation and Opportunity Act of 2014 Public Law 113-128, Section 129(c)2(I) and 134(c)(2)(A)(xiii)
- 20 CFR § 680.150(c), § 678.430(c), § 681.580
- Training and Employment Guidance Letter (TEGL) 19-16
- Training and Employment Guidance Letter (TEGL) 10-16 change 1
- Training and Employment Guidance Letter (TEGL) 21-16, 8-15, 23-14
- Training and Employment Guidance Letter (TEGL) 26-16
POLICY:
Follow-up services should only be provided to WIOA Title I Adult and Dislocated Worker program participants who are placed in unsubsidized employment. Follow-up services must be provided for twelve (12) months after placement in unsubsidized employment and may be extended beyond the 12-month period if the Provider or Case Manager determines this to be appropriate for the individual. The types of services provided, and the duration of services provided during Follow Up must be determined based on the needs of the individual and align with their Individual Employment Plan (IEP). As a result, the type and intensity of follow-up services may differ for each participant.

Follow-up services should be provided to WIOA Title I Youth program participants for twelve (12) months after exit and may be extended beyond the 12-month period if the Provider or Case Manager determines this to be appropriate for the individual. The types of services provided, and the duration of services provided during Follow Up must be determined based on the needs of the individual and align with their Individual Service Strategy (ISS) Plan. As a result, the type and intensity of follow-up services may differ for each participant.

Follow Up services must be completed for all quarter beginning with the first quarter after the exit date. Quarters include three months, grouped as follows: • January, February, March • April, May, June • July, August, September • October, November, December For example: if the participant’s Last Date of Service was on August 30, their first Follow Up will be during October, November, or December.

Follow Up activities and services can be discontinued if:
• If the participant declines to receive Follow Up Services (must be documented in SCWOS case note); Or
• The participant cannot be located after a period of 90 days and five contact attempts have been documented in SCWOS; Or
• Individual meets exclusion criteria (see below).

Follow-up services do not trigger the exit date to change or delay exit for performance reporting as per guidance issued by DOL in TEGL 10-16-1.
• Adult and Dislocated Worker: Because follow-up services can only be provided to individuals who have system-exited and supportive services can only be provided to Adult and Dislocated Worker participants, supportive services cannot be provided to Adult and Dislocated Worker individuals as a form of follow-up service.
• Youth: May be provided support services during follow up in accordance with the most recent Lowcountry Support Service Policy in effect.

Follow-up services for system-exited WIOA Title I program participants are two-way exchanges between the service provider or case manager and the individual. Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome. Follow Up Services are a separate and distinct services that provide value to the individual as opposed to the collection of documentation and reporting of Federal Performance Outcomes which are also required, but do not provide value to the individual.
Federal Performance Outcome Activities are required Follow Up activities that include contacting or attempting to contact an exited participant for the purpose of securing documentation for the case file in order to report a performance outcome. Reasonable effort to contact the participant on separate occasions must be attempted: In-person, telephone, email, text, or by letter. The Provider or Case Manager must make reasonable effort to vary the time of day, day of week, and method of contact. Performance data for every quarter after exit must be entered in SCWOS. All SCWOS data entry for federally reported performance must strictly adhere to TEGL 26-16.

Each exit of a participant during a program year counts as a separate period of participation if a participant has more than one exit in that program year the follow up applies to each separate period of participation.

**EXCLUSION:**
If a participant meets one of the criteria listed below, a “hard exit” is required. The Provider or Case Manager must contact the Lowcountry Area SCWOS Coordinator for written authorization to Exclude.

These individuals are excluded from performance and additional Follow Up services.

A. Institutionalized: the participant exits the program because he or she has become incarcerated in a correctional institution or has 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. Health/Medical: 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. Deceased: the participant is deceased.

D. Reserve forces called to active duty: the participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.

E. For Youth only: 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 program or system.

**DATA ENTRY and PROCESS:**
Follow Up contacts and attempts to contact must be entered in SCWOS on the Program tab in the appropriate Follow Up section (1st Quarter, 2nd Quarter, 3rd Quarter, 4th Quarter).

- This is the source of all Supplemental Data reported to DOL and data entry must be in compliance with all applicable aspects of TEGL 26-16 including the collection and maintenance of required verification documents, the timing for collection and the timeframe covered by the verification documents that must be included in the participant file.

Follow Up services are designated with the letter ‘F’. Data Entry of the activity code should be based on the most recent applicable State Activity Code Definitions documents to ensure accurate data entry of the correct service code (F-type codes). The services are 1 Day Maximum and must be entered in under the Services/Activities Tab in SC Works Online Services (SCWOS) as they are provided. Details of services provided must be included in case notes.
For all exited participants, the Follow Up Tab in SCWOS must be completed in a timely manner with accurate information and applicable back-up documentation in accordance with TEGL 26-16 as it may impact performance.

Successful and unsuccessful contacts must be recorded in SCWOS in the Contact Attempt section under the appropriate Follow Up Quarter and detailed in SCWOS case notes.

Case Closure/Outcome/Exit
• When a participant has completed their Plan (IEP/ISS) – Planned Exit:
  (1) Case Manager/Service Provider (CMSP) will conduct a Case Closure interview with the participant. CMSP will provide information to the participant that they are entering 12 months of follow-up services – they are NOT done with service, just entering a different phase for the next 12 months/4 quarters. This session will cover:
    a. How and when services will occur for the next 12 months and agreed to a plan to stay in touch (phone, email, text, etc.), the participant’s responsibilities during this time (to respond/stay in touch and to communicate any changes in Placement, Credentials, Contact Information (including Alternate Contact changes).
    b. CMSP will confirm all Contact and Alternate contact information is correct and will update data entry in SCWOS (Individual Profile>Personal Profile>General Information and/or Staff Profile>General Profile>Activities>Alternate Contacts).
  (2) CMSP will review the participant’s social security card and will check it against the social security number recorded in SCWOS to ensure accuracy since UI wage records are reported by social security number.
  (3) CMSP will obtain and record Placement information on the WIOA Case Closure screens in SCWOS.
    a. If it is determined that the Placement is covered under UI, collection of supplemental documentation will not be required. In addition, the quarterly follow-up screens will not need to be completed. However, participants should be advised to contact the CMSP in the event they lose their job or should job-related problems arise.
    b. Supplemental data in compliance with TEGL 26-16 should be collected for four quarters following exit for participants who are self-employed, working for an employer not covered under UI, or working in another state, or for Youth Placement in Education or Training. The individual’s Placement status must be recorded and verified (required verification documentation on file) on the appropriate quarterly follow-up screens in SCWOS.
  (4) CMSP will close out all Objectives and Goals on the Plan
  (5) CMSP will then close the Plan
  (6) CMSP will Close out all activities on the Program tab (Actual End Date, Completion Status)
  (7) Create a Case Closure – enter all applicable data
    a. For those who received Training, this includes a CAREFUL review of the Training O*NET Code to the O*NET Employment Code
      i. A match on the first 4 digits of Training O*NET and Employment O*NET will result in the “Training Related Employment” setting to “YES”. If CMSP believes the Training and Employment should match, but the system doesn’t set to “YES”, send written notice to the Lowcountry SCWOS Coordinator.
(8) Create a Case note a wrap up/summary that briefly reviews all important information (training, credentials, employment, placement details, etc.).
(9) Begin required monthly follow up services (12 required monthly follow-ups, case notes, and applicable F-code data entry)
   a. Complete the required 4 Quarterly follow-ups with information obtained from the monthly follow-ups.

NOTE: The Case Closure is a place-holder, a way for everyone to easily see who is placed, where they are placed, when they were placed, etc. Actual Exit/Outcome will only happen after 90 days with no service that extends exit. If within 90 days of the last service that extends exit, when no Exit/Outcome exists and the individual’s situation changes, CMSP may Delete the Case Closure and begin delivering WIOA services in accordance with the IEP/ISS (Plan update will be required upon deletion of the Case Closure).

For more information on Case Closure, please go to SCWOS Staff Online Resources>How To Guides>SCWOS Staff User Guide>Section 6: Programs – WIOA Case Closure.

• When a participant has not completed their Plan (IEP/ISS) and an Unplanned Exit/Outcome (soft-exit) has occurred:
  1. CMSP will close out all Objectives and Goals on the Plan
  2. CMSP will then close the Plan
  3. Create a Case note a wrap up/summary that briefly reviews all important information (training, credentials, employment, placement details, etc.)
  4. Begin required monthly follow up services (minimum of 12 required monthly follow-ups, case notes, and applicable F-code data entry)
     a. If contact is successful, Case Manager/Service Provider (CMSP) will conduct a Case Closure interview with the participant. CMSP will provide information to the participant that they are entering 12 months of follow-up services – they are NOT done with service, just entering a different phase for the next 12 months/4 quarters. This session will cover:
        i. How and when services will occur for the next 12 months and agreed to a plan to stay in touch (phone, email, text, etc.), the participant’s responsibilities during this time (to respond/stay in touch and to communicate any changes in Placement, Credentials, Contact Information (including Alternate Contact changes).
        ii. CMSP will confirm all Contact and Alternate contact information is correct and will update data entry in SCWOS (Individual Profile>Personal Profile>General Information and/or Staff Profile>General Profile>Activities>Alternate Contacts).
        iii. CMSP will review the participant’s social security card and will check it against the social security number recorded in SCWOS to ensure accuracy since UI wage records are reported by social security number.
iv. CMSP will obtain and record Placement information on the WIOA applicable WIOA Follow Up screens in SCWOS.

1. If it is determined that the Placement is covered under UI, collection of supplemental documentation will not be required. In addition, the quarterly follow-up screens will not need to be completed. However, participants should be advised to contact the CMSP in the event they lose their job or should job-related problems arise.

2. Supplemental data in compliance with TEGL 26-16 should be collected for four quarters following exit for participants who are self-employed, working for an employer not covered under UI, or working in another state, or for Youth Placement in Education or Training. The individual’s Placement status must be recorded and verified (required verification documentation on file) on the appropriate quarterly follow-up screens in SCWOS.

(5) Complete the required 4 Quarterly follow-ups with information obtained from the monthly follow-ups

Additional CMSP Case Closure Responsibilities (for both Planned and Unplanned Exits):

1. Review all data entry and case notes (including Documents) for completeness, accuracy and data validation. All necessary Change Request forms must be sent to the Lowcountry SCWOS Coordinator. This review must include:
   - Educational Functioning Level for Measureable Skills (EFL for MSG)
     - Are all EFL gains entered and a match to supporting documentation scanned in the Electronic Data Management System (EDMS) module?
   - Measureable Skills Gain (MSG)
     - Are all MSGs entered and a match to supporting documentation scanned in the Electronic Data Management System (EDMS) module including correct identification Skill Type, Date Skill Attained, and Type of Achievement?
   - Credential
     - Are all Credentials entered and a match to supporting documentation scanned in the Electronic Data Management System (EDMS) module including correct identification of the Date and type of Credential?
   - Actual Start and End Dates for activities are correct and supported by documentation (case notes or attendance as applicable)

**ACTION:** The information provided herein should be distributed and reviewed by all Lowcountry Staff, Contractors, Service Providers, Sub-recipients, One-Stops, a copy should be maintained in a central location.

Any discrepancies arising between policy and or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. Lowcountry policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will Lowcountry policy and or procedures not meet minimum federal and state policy.
CONTACT: Questions regarding this instruction should be directed to Shelly Campbell, Lowcountry Workforce Area, Lowcountry Council of Governments, Post Office Box 98, Yemassee, SC 29945, scampbell@lowcountrycog.org.

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