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To: Workforce Development Board Executive Directors
One-stop Operators and Job Center Contacts
Youth Program Managers/Lead Contacts
ASSET User Group

From: Gary Denis 
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Subject: **Workforce Investment Act (WIA) Policy Update 06-06 – WIA Follow-up Services – CORRECTED VERSION**

Purpose

This update to the WIA Follow-up Services policy is being sent to provide consistent language in the policy for terminating contact during follow up with adult, dislocated worker AND older and younger youth participants. (See amended text under "Older and Younger Youth" section.)

It is an addition to policy revisions provided on August 3, 2006, which provided a systematic approach for WIA follow-up services and provides guidelines for ending follow-up services when participant contact is lost. The U.S. Department of Labor (U.S. DOL) provided clarification on participant exits and follow-up services in Training and Employment Guidance Letter (TEGL) 17-05 and through correspondence with Division of Workforce Solutions (DWS) Policy staff, thus the reason for this revision. This policy replaces WIA Policy Update 04-02.

Workforce Development Boards (WDBs) have requested guidance regarding the following:

- Whether WIA funds can be used on follow-up services once a participant is exited;
- What kinds of activities can be provided during follow-up;
- How these services are to be recorded in the Automated System Support for Employment and Training (ASSET);
- How such expenditures should be recorded on the WIA Monthly Financial Status Report; and
- The duration of follow-up service tracking when a participant cannot be located or no longer wants to be contacted by program case managers.

This proposed policy revision is targeted primarily at WIA Title 1 programs, but it may have an impact on Trade Adjustment Assistance (TAA), WIA Title 3 Veterans programs and Job Service customers.

Policy/Legislation References

- Workforce Investment Act Title IB, Section 129(c)(2)(I); Section 134 (d)(2)(k), Section 134(e)(3)(A).
- 20 CFR part 663; 663.150(b); 663.155; 664.450(a)(b).
- U.S. DOL TEGL 17-05 Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues.
- DWS Workforce Programs Guide, Part 2. Section II. (o); Section III. (I)(9).

Background

Follow up services are a required activity for youth and an allowable activity for adults and dislocated workers under WIA Title 1. The goal of follow-up services for adult, dislocated worker and older youth (19 to 21 years old) customers is to ensure job retention, wage gains, and career progress for individuals who obtain unsubsidized employment. The goal of follow-up services for younger youth (14 to 18 years old) participants is to enable participants to continue life-long learning and achieve a level of self-sufficiency.

Analysis of WIA Title 1 and TAA participant outcomes shows that when customers leave our programs, they experience intermittent gaps in employment during the first three quarters after exit. Many participants who exit and are employed in the first quarter after exit, are unemployed in the second and/or third quarters after exit. Over the past 5 years, data show that the number of participants employed in the third quarter after exit declines by as much as 50% in some WDAs, compared to the first quarter after exit. Because follow-up services are not required as part of Adult and Dislocated Worker program participation, many providers are reluctant to invest resources in customers who are no longer considered "active." The data suggest that program participants:

- Leave the program before they are ready;
- Have not acquired the skills the programs strive to impart;
- Continue to have barriers that affect their ability to retain employment; and
- Would likely benefit from follow-up services that would prevent job loss.

U.S. DOL TEGL 17-05 changed the definition of an exit. Effective July 1, 2006, "hard" (i.e., case manager-entered) exits will not occur. Instead, States will perform "program exits." A program exit means that a participant has not received a service funded by the program or funded by a partner program for 90 consecutive calendar days, and is not scheduled for future services. The exit date is the last date of service. Further guidance on program participation and exit dates is provided in DWS WIA Policy Update 06-03. While follow-up services are still defined as post-exit activities, U.S. DOL has determined that case managers may plan for and provide follow-up services during the 90-day period between the date of last program service and the activation of the exit.

Follow-up services are more than phone calls and periodic contacts such as monthly form letters. It may be beneficial to follow-up with both customers and their employers. The following suggestions may improve follow-up service delivery:

- When developing individual service strategies, define mutually-agreed upon services and goals with the customer, including follow-up and retention services as part of the package of services that will be provided.

- Follow-up services are a distinct program activity that can have significant impacts on program outcomes. Local areas may focus resources specifically on follow-up services such as having staff that specialize in providing follow-up services.
- Avoid referring to a customer's "exit status." This conveys the impression that the case manager no longer wishes to provide assistance to the customer and that the relationship between customer and case manager is finished. When the customer moves into the follow-up and retention phase, set reminders using tickler files or scheduling software.

Policy

Follow-up service goals should emphasize job retention and advancement, lifelong learning, and self-sufficiency. Case managers and program operators should be prepared to provide additional services as needed to assist Job Center customers and program participants in achieving these goals. Follow-up is critical to ensure successful, long-term employment and WIA performance outcomes. The follow-up provided should be based upon individual customer needs as well as the goals and objectives of the local WDB system. While intensity, frequency, and type of follow-up services are determined at the local level, the Department of Workforce Development (DWD) recommends that program providers conduct follow-up frequently enough to address on-the-job issues and prevent job loss.

Adults and Dislocated Workers:

Under WIA Title 1, follow-up services **must be made available** to adults and dislocated workers, who are placed in unsubsidized employment, following the first day of their employment. Case managers should review the participants' needs as well as their individual employment plans (IEP) to determine if it is appropriate to provide them with follow-up services; but must not assume that if follow-up services don't appear to be necessary at the time of exit, they won't be needed later on, either. While follow-up services must be made available, not all of the adults and dislocated workers who received services will need or want such services. Participants who have multiple employment barriers and limited work histories may be in need of significant follow-up services to ensure long-term success in the labor market.

Training and supportive services provided after entry into unsubsidized employment (post-placement/entered employment) should be limited, and clearly documented in the customer's record. Such post-placement/entered employment training and supportive services may be provided consistent with policies established by the local workforce development board and determined to be necessary on an individual basis by the board. They are also allowable expenditures under the WIA rules and regulations.

A systematic approach to follow-up services is encouraged to help enhance long term outcomes for adults and dislocated workers. When the method employed for participant follow-up does not produce a successful result or if local staff loses contact with a participant after repeated attempts, all such attempts should be documented in the case file.

Before terminating all contact with a participant during follow-up, intensive strategies must be attempted to establish contact such as home visits, sending registered or return receipt mail, or contacting the last known employer. If the participant cannot be reached after three (3) attempts, one of which is an intensive strategy, over a minimum of a 3-month period, the provision of follow-up activities may be terminated with appropriate documentation in the participant record.

Older and Younger Youth:

All youth participants **must receive** some form of follow-up services for a minimum of 12 months after they exit the Youth program. Follow-up services may be provided beyond 12 months at the State or local Workforce Development Board's discretion. The types of services provided and the duration of services must be determined based on the needs of the individual.

A systematic approach to follow-up services is encouraged to help enhance long term outcomes for youth. When the method employed for participant follow-up does not produce a successful result or if local staff loses contact with a participant after repeated attempts, all such attempts should be documented in the case file.

Before terminating all contact with a participant during follow-up, intensive strategies must be attempted to establish contact such as home visits, sending registered or return receipt mail, or contacting the last known employer or school. If the participant cannot be reached after three (3) attempts, one of which is an intensive strategy, over a minimum of a 3-month period, the provision of follow-up activities may be terminated with appropriate documentation in the participant record.

Local areas may conduct a broad range of activities, including those identified as "best practices" such as: (1) developing a close mentoring relationship before and after placement; (2) providing intensive support and mentoring during the first part of the follow-up period, since job loss and other setbacks may occur early in the post program time period; (3) providing engaging activities to help young people stay connected such as evening and weekend socials, recreation and cultural events; (4) maintaining a network of services that support the whole person and help youth access those services; and (5) maintaining a non-intrusive contact with employers of youth. Flexibility is allowed for less intensive methods due to factors such as program design, cost effectiveness, or limited staffing. The activities described above are allowable expenditures under the WIA rules and regulations.

Veterans:

While the Veterans Program does not required follow-up services, veterans enrolled in WIA programs should receive follow-up services as part of their enrollment in those specific programs. Although not required, local areas are providing follow-up services to Chapter 31 Veteran's Administration Vocational Rehabilitation and Employment participants and will soon provide follow-up services to veterans enrolled in the Incarcerated Veteran Training Program.

Funding of Follow-up Services

1. WIA funding for adults and dislocated workers follow-up services is an allowable expenditure.
2. Financial assistance in the form of needs-related payments for employed participants is not an allowable follow-up service, if a customer has exited the program. These payments are restricted to unemployed active participants who have exhausted or do not qualify for unemployment compensation and who need the payments to participate in training.

Appropriate and Allowable Activities

The following guidance is provided to assist program providers in determining what follow-up services would be appropriate and allowable expenditures. Follow-up services may be provided beyond 12 months at the discretion of the local WDB. While follow-up services must be made

available, not all participants will need or want such services. The scope and intensity of appropriate follow-up services may vary among different participants and should be consistent with the individual service strategy for each participant.

All WIA activities, except needs-related payments that were allowable prior to program exit, are allowable after exit and can be paid for using WIA allocated program funds. Exiting the program does not mean that services end. The WIA allows service providers and program operators to continue serving participants without forcing them to re-enter the program as active participants.

Sample follow-up activities are listed below for the adult and dislocated worker programs and the youth programs.

Adult and Dislocated Worker Programs Follow-up Services:

- Additional career planning and counseling (for example, labor market information, demand occupations, job search assistance, entrepreneurial training, career counseling, resume development, etc.);
- Employer contact, including assistance with work-related problems (for example, on-site visits, information on Work Opportunity Tax Credit, bonding, workplace training instruction, post-employment (entered employment) training on interim services or a limited basis, incumbent worker services, English as a Second Language, etc.);
- Information about additional educational opportunities (for example, referral to WI Technical College System or other institutions, General Educational Development Test, WIA funded and other educational opportunities, etc.);
- Peer Support Groups (for example, group counseling, workshops, etc.); and
- Supportive Services information (for example, childcare, housing, transportation, vocational rehabilitation assistance, work clothing, etc.).

Youth Programs Follow-up Services:

- Adult Mentoring (for example, job shadowing, tutoring, etc);
- Assistance in securing better paying jobs, career development, and further education (for example, labor market information, career counseling, job search assistance, work experience programs, etc.);
- Employer contact (for example, assistance in addressing work-related problems);
- Job Club or another type of continuing post placement activity to keep youth engaged and help identify retention problems;
- Leadership development opportunities that encourage responsibility, employability, and other positive social behaviors. (For example, exposure to post secondary educational opportunities; community and service learning projects; peer-centered activities, including peer mentoring and tutoring; organizational and team work training, including team leadership training; training in decision-making, including determining priorities; and citizenship training including life skills training such as parenting, work behavior training and budgeting of resources);
- Supportive Services activities (for example, linkages to community services; referrals to medical services; and assistance with childcare and dependent care, housing, transportation and/or uniforms or other appropriate work attire and work-related tools, including eye glasses and protective eye gear);
- Tracking progress in employment after training (for example, regularly-scheduled follow up, including in-person sessions); and
- **Work-related Peer Support Group** (for example, workshops, English as a Second Language, literacy, etc.).

Reporting Follow Up Services in ASSET

The timeline for making necessary changes to ASSET has not been finalized. Report Follow-Up Services under the “Manage Follow-ups” function. DWS intends to relax the Follow-Up Services edit check to permit entry of follow-up services prior to the activation of the exit date. The process for reporting follow-up services in ASSET has not changed.

To report follow-up services in ASSET:

1. Select “Manage Follow-Ups”;
2. Go to “Follow-up Services”;
3. Click, “Add Follow-up Service” button;
4. Enter the appropriate information and save the record.

For further instruction on how to enter and update follow-up services, see the *ASSET User's Guide* at <http://www.dwd.state.wi.us/dws/manuals/asset/>. The *User's Guide* can be accessed by selecting “Help” from the ASSET menu selection list.

Details for on-line ASSET reports to track exits have not been finalized and are contingent on the implementation of WIA Policy Update 06-03: Definition of Participant and Exiter. For the time being, the on-line Soft Exit warning and soft exit reports can be used for viewing participants who are scheduled to be exited and those that have been exited.

WIA Monthly Financial Status Reporting

Follow-up service costs are defined as current period program expenditures and should be reported on a WDA's WIA Monthly Financial Status Report.

Questions and Technical Assistance

If you have questions regarding this policy, please contact the Local Program Liaison (LPL) assigned to your area.