North Central
Workforce Development Area

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LOCAL DIRECTIVE

Directive #: 18-164 Rev 1	Date: June 1, 2020

TO: SkillSource Staff and Service Providers
FROM: Dave Petersen, Executive Director
SUBJECT: Follow-Up Services
SUPERSEDES: Directive # 18-164

Summary of Changes:

1) Adds number of follow up contact attempts required for youth participants
2) Adds guidance re: supplemental performance information for individuals who do not disclose their Social Security Number (SSN) upon eligibility application or enrollment.

In reference to WIOA sections 134(c)(2)(A)(xiii) and 129(c)(2)(I) and in compliance with TEGLs 10-16 and 19-16, Title I-B staff will perform follow-up services with participants exiting from adult, dislocated worker, and youth programs. This directive defines eligibility for follow-up services and outlines the frequency, duration, and service entry of follow-up services.

Defining Follow-Up Services

Follow-up services for Adults and Dislocated Workers are described as "services, including counseling regarding the workplace, for participants in workforce investment activities who are placed in unsubsidized employment, for not less than 12 months after the first day of the employment, as appropriate."

Follow up services for Youth are described as, "critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow up services may include regular contact with a youth participant's employer, including assistance in addressing problems that arise." [CFR 681.580 (a)]

Adult and Dislocated Worker Follow-up Services

WIOA Title I Adult and Dislocated Worker program participants who are placed in unsubsidized employment and have completed the program may receive follow-up services.

1. Follow-up services determined by a Training Counselor to be appropriate for those individuals must be provided for a period of up to 12 months (i.e., not more than 12 months).

2. Follow-up services for WIOA Title I Adult and Dislocated Worker program participants may include, but are not limited to:

   - Counseling individuals about the workplace.
   - Contacting individuals or employers to verify employment.
   - Contacting individuals or employers to help secure better paying jobs, additional career planning, and counseling for the individual.
   - Assisting individuals and employers in resolving work-related problems.
   - Connecting individuals to peer support groups.
   - Providing individuals with information about additional educational or employment opportunities.
   - Providing individuals with referrals to other community services.
   - Providing access to any career planning/development or skills brush up workshop provided in-house at SkillSource or SkillSource subcontractor.

3. The frequency and amount of service is based on individual need. Individuals who are starting their first professional job may need more services and services at a higher frequency than those who have had several years of attachment to the labor force.

4. Generally, the first follow-up service will be initiated within 30 days of the participant's placement into unsubsidized employment and once every three months thereafter for up to 12 months.

5. Staff may, in agreement with the participant, discontinue outreach for follow-up (i.e. the staff member initiates the communications) for individuals who remain stable in employment for the first two quarters of their follow-up period. For these stable individuals, staff shall inform them that they remain eligible for follow up services for an additional two quarters and shall provide contact information.

6. In the event that 1) contact information proves invalid, 2) participant does not respond to multiple contact attempts or, 3) participant communicates they no longer want to receive follow up services, staff will make a case note and may, at that point, discontinue follow up contacts.

   NOTE*:* Supportive services cannot be provided to Adult and Dislocated Worker exited participants as a form of follow-up service.

Youth Follow-up Services

1. 20 CFR 681.580 states that all youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Furthermore, follow-up services must be provided to all participants for a minimum of 12 months unless the

participant declines to receive follow-up services or the participant cannot be located or contacted.

2. Exited youth (both in and out of school) may be provided the following basic or individualized career services needed to sustain progress in post-secondary activities and/or employment: support services, adult mentoring, financial literacy, provision of labor market information, career awareness, career counseling and career exploration services and/or activities that help the individual prepare for and transition to postsecondary education and training.

3. Exited youth may be provided supportive services, when not otherwise available in the community, when this is needed to retain employment, advanced training, or post-secondary participation. Rationale for extending supportive services to exited youth as a follow-up service will be entered in case notes.

4. Generally, the first follow-up service is initiated within 30 days of the participant's program completion and no less than once every three months thereafter for up to 12 months.

5. In the event that 1) contact information proves invalid, 2) participant does not respond to multiple messages <u>(at least 3 contact attempts)</u> or 3) participant declines continued follow up services, staff will make a case note and may, at that point, discontinue follow up contacts.

Service Entry

1. Follow-up services are entered into the MIS system under the program follow-up touchpoint. Be as complete as possible with the information available. Some follow-up services (verification of employment) may be initiated by the participant via email, phone message, or text, and the information obtained may be fragmentary or incomplete.
2. The service entry may include both the service provided and any credential earned during the follow-up period.
3. Efforts to provide follow-up services to individuals who do not respond to outreach are captured in a case note in the follow-up touchpoint.
4. When a staff member learns that an individual experiences a situation that causes an exit exclusion, this will be captured in the follow-up touchpoint. At this time, no further outreach during the follow-up period is required.

Guidance for Participants Not Disclosing SSNs

1. <u>Disclosure of SSNs is recommended but not mandatory for determination of eligibility or enrollment in Title I services. However, the primary mechanism for determining employment outcome measures is data matching using the participant's SSN. Therefore, supplemental wage information must be gathered and manually entered into ETO for any individual who did not disclose their SSNs.</u>

2. <u>Service delivery staff must explain to participants who receive services without providing SSN that they and possibly their future employers will be contacted and asked about their employment and earnings outcomes. To that end, staff must ensure that full</u>

and extensive contact information is collected from such participants (primary and secondary phone numbers, e-mail addresses, mailing addresses, including the same for alternative and secondary contacts) and instruct such participants to provide updated contact information if anything changes. In following up with participants, staff should contact them as close as possible to the end of the second and fourth quarters after exit.

3. Upon receiving supplemental wage information, staff must take the Program Outcome TouchPoint in ETO to record the employment and wage information (use the OMB wage conversion chart provided in Attachment 3 of TEGL 10-16, Change 1, if necessary, to convert figures into quarterly wages required for federal reporting).

4. Acceptable forms of supplemental wage information include, but are not limited to, the following:
   a. Tax documents, payroll records, and employer records such as:
      - Copies of quarterly tax payment forms to the Internal Revenue Service (e.g., IRS Form 941 (Employer's Quarterly Tax Return)) from the reference quarters.
      - Copies of pay stubs (minimum of two) from the reference quarters.
      - Signed letter or other information from employer on official letterhead attesting to an individual's employment status and earnings during the reference quarters.

   b. Other supplemental wage records:
      - Follow-up survey (self-reported) of participants during the reference quarters.
      - Income earned from sales commissions or similar positions during the reference quarters.
      - Detailed case notes verified by employers and entered by case managers during the reference quarters.
      - Administrative records from other partners' automated database systems for which data sharing agreements exist, including current records of eligibility for programs with income-based eligibility (e.g., Temporary Assistance for Needy Families(TANF) or Supplemental Nutrition Assistance Program SNAP) from the reference quarters.
      - Self-employment worksheets (that reflect income after expenses during the reference quarters) signed and attested to by participants.

NOTE: All documentation used to verify supplemental wage information and employment must be retained in the participant file.

References

- Workforce Innovation and Opportunity Act of 2014, Section 134(c)(2)(A)(xiii) – Follow-Up Services
- TEGL 3-15
- TEGL 19-16, Section 4
- TEGL 10-16, Section 7, pg. 34
- TEGL 21-16, Section 7, pg 19
- 20 CFR 681.580 (a)

- WIN 0078 Change 1 - Provision of Title 1 Follow-up and Supportive Services Before and After Exit for Adults and Dislocated Workers
- WIN 0081 Change 3 - WIOA Title I and III procedures for creating accounts in Efforts to Outcomes (ETO) when individuals do not provide Social Security Numbers.