



GUIDING MARION COUNTY'S WORKFORCE

## POLICY OF EMPLOYINDY

<b>Policy Name</b>	Follow-Up
<b>Policy Number</b>	2015-008
<b>Program Funding Stream</b>	WIOA – Adult, Dislocated Worker and Youth

REV	Description of Change	Author	Effective Date	Review Date
	Reissued and replaces policy # 2009-OP-005 – Follow-Up and merges policy # 2013-OP-002 – Youth Follow-up	W. Miller	Upon Approval	6-30-16
	Extends Review Date	S. Johnson	Upon Approval	5/30/2018
	Clarifies use of supportive services during follow-up.	P. Dunning	5/15/2018	4/30/2019

### 1. Purpose

To establish criteria for follow-up services for individuals who have exited the Adult, Dislocated Worker or Youth programs under the Workforce Innovation and Opportunity Act (WIOA).

### 2. Scope

This policy provides guidelines to service providers on the frequency of follow-up and follow-up services and timelines for completing these activities. It also provides guidance on the differences between follow-up and follow-up services.

### 3. Summary of the Law, Rules, and Governing Policies

WIOA Sec 129(c)(2)(I) provides that follow-up services is one of the 14 required WIOA youth program elements.<sup>1</sup> Follow-up services must be provided (made available) for not less than 12 months after the end of the youth’s program participation.

WIOA Sec 134(c)(2)(A)(xiii) establishes that career services for adults and dislocated workers includes “follow-up services, including counseling regarding the workplace, for participants in

<sup>1</sup> 29 U.S.C. § 3164(c)(2)(I)

workforce investment activities authorized under this part who are placed in unsubsidized employment, for not less than 12 months after the first day of the employment, as appropriate.”<sup>2</sup>

TEGL No. 19-16 provides further guidance on follow-up for adults.<sup>3</sup>

20 C.F.R. § 681.580 and TEGL 21-16 provides that, for youth, follow-up services may include the following program elements:

- (1) Supportive services;
- (2) Adult mentoring;
- (3) Financial literacy education;
- (4) Services that provide 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; and
- (5) Activities that help youth prepare for and transition to postsecondary education and training.

DWD guidance states that “Follow-up includes:

- Counseling regarding the workplace, for participants in adult or dislocated worker workforce investment activities who are placed in unsubsidized employment, for up to 12 months after **the first day of employment** (rather than for 12 months after exit).
- Basic self-service and informational career services provided during the 90 days following the close of individualized career services, training, or placement.”<sup>4</sup>

#### 4. Responsibilities

EmployIndy Career Services Department is responsible for providing guidance, validation and periodic review of this policy.

Service Provider(s) will be responsible for implementing this policy and ensuring follow-up services are provided, as appropriate, to participants who exit from WIOA services.

#### 5. Policy Statement

WIOA treats follow-up differently for youth compared to adults and dislocated workers.

##### What is the purpose of follow-up?

The objective of the follow-up is to identify any problems that might jeopardize employment and to provide services (follow-up services), as appropriate, to ensure career progression and/or job retention. In the case of youth who were placed in postsecondary education or training, the follow-up will assist them with the adjustment to postsecondary education and with continued career planning and employment.

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<sup>2</sup> 29 U.S.C. § 3174(c)(2)(A)(xiii)

<sup>3</sup> [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_19-16\\_acc.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_19-16_acc.pdf)

<sup>4</sup> Department of Workforce Development, *MEMORANDUM Interim Guidance on the Delivery of WIOA Title I Adult and Dislocated Worker Services and the Impact on Participation and Exit Dates*, July 2, 2015, [http://www.in.gov/dwd/files/Interim\\_Guidance\\_WIOA\\_Services\\_Participation\\_Exit\\_final.pdf](http://www.in.gov/dwd/files/Interim_Guidance_WIOA_Services_Participation_Exit_final.pdf). (emphasis in original).

When must follow-up services be offered?

For adults and dislocated workers, follow-up services must be offered for at least 12 months after unsubsidized employment.<sup>5</sup> For youth, follow-up services must be provided at least 12 months after the end of the youth's program participation.<sup>6</sup>

How must follow-up services be offered?

Follow-up may be conducted by telephone, in person, via e-mail (or other social media), or by written correspondence. Preference is for the follow-up to be through a medium that increases the probability of interaction with the participant and also increases the probability of continued contact.

Follow-up services require contact, interaction, and the provision of an acceptable follow-up service. As an example, a text to provide assistance with a job or work-related problem is follow up. However, although sending a letter might be considered "following-up" this is not considered a follow-up service since interaction and the provision of an actual follow-up service are required.

How frequently does EmployIndy require follow-up?

The adult and dislocated worker service provider(s) shall have at least one (1) contact per month for the first six months after the exit date with each adult or dislocated worker who enters unsubsidized employment or who has received training through WIOA funding. After the initial six months, the service provider shall, at a minimum, follow-up on a quarterly basis through the end of the first year following the exit date.

The youth service provider(s) shall have at least one (1) contact per month for the first six months after the exit date and for the next six months shall have at least quarterly follow-up.

A follow-up schedule shall be maintained for each applicable participant. All follow-up and follow-up services must be documented in the case management system.

Can supportive services be provided during follow-up?

For adults and dislocated workers, follow-up career services are not a qualifying service for the receipt of supportive services; therefore, an adult or dislocated worker who is only receiving "follow-up" services may not receive supportive services.<sup>7</sup>

For youth, supportive services may be offered during follow-up.<sup>8</sup>

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<sup>5</sup> 29 U.S.C. § 3174(c)(2)(A)(xiii)

<sup>6</sup> 29 U.S.C. § 3164(c)(2)(I)

<sup>7</sup> U.S. DOL TEGL 19-16, *Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules*, Mar. 1, 2017, [https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=3851](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3851).

<sup>8</sup> 20 C.F.R. § 681.580; U.S. TEGL 21-16, *Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Guidance*, March 2, 2017, [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_21-16\\_Acc.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_21-16_Acc.pdf).

### What are follow-up services?

Follow-up includes but is not limited to:

- Maintaining regular contact; and may include:
  1. Counseling services – examples include, but are not limited to:
    - a. Working with the customer to identify emerging problems that would affect employment;
    - b. Helping customers gain job-coping skills;
    - c. Providing support and advice;
    - d. Counseling regarding the workplace;
  2. Supportive services - helping the customer to access needed supportive and transitional services as appropriate (i.e. transportation, child care, medical care, etc.); and
    - a. Supportive services during follow-up are only available to Youth.
    - b. For adults and dislocated workers, supportive services during follow-up cannot be paid with WIOA funds;
  3. Basic self-service and informational career services provided during the 90 days following the close of individualized career services, training, or placement.<sup>9</sup>
- For youth,
  1. Supportive services;
  2. Adult mentoring;
  3. Financial literacy education;
  4. Services that provide 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; and
  5. Activities that help youth prepare for and transition to postsecondary education and training.<sup>10</sup>

Attachment A includes a table of those services classified as “follow-up services” in Indiana Career Connect (ICC).

Should a job-seeker who has been placed in unsubsidized employment lose their job or be placed in unsubsidized employment but has not reached self-sufficiency, employment services should be re-engaged. Such services include, but are not limited to:

- Counseling regarding reasons for the job loss and career opportunities
- Job search assistance; and
- Job placement assistance

Participants in WIOA-funded training or education who have exited WIOA prior to being placed in unsubsidized employment shall be provided follow-up services. Such services include, but are not limited to:

- Counseling regarding plans to become employed including advice on career opportunities

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<sup>9</sup> Department of Workforce Development, *MEMORANDUM Interim Guidance on the Delivery of WIOA Title I Adult and Dislocated Worker Services and the Impact on Participation and Exit Dates*, July 2, 2015, [http://www.in.gov/dwd/files/Interim\\_Guidance\\_WIOA\\_Services\\_Participation\\_Exit\\_final.pdf](http://www.in.gov/dwd/files/Interim_Guidance_WIOA_Services_Participation_Exit_final.pdf).

<sup>10</sup> 20 C.F.R. § 681.580

- Job search assistance
- Job placement assistance

## 6. Exceptions

For adults, dislocated workers, and youth, follow-up services may be discontinued after the end of the second quarter after exit only if the service provider has been unable to reach the participant and if reasonable attempts to contact have been made. Attempts must have been made to all telephone numbers and through at least one other medium. This must be documented in the case notes.

For adults, dislocated workers, and youth, follow-up services may also be discontinued if the participant indicates that they no longer need or want the follow-up contact. The participant must send an email or a writing indicating the participant's desire not to be contacted further. Service provider staff shall not solicit this request. This must be documented in the case notes.<sup>11</sup>

For adults, dislocated workers, and youth, follow-up may be continued beyond the one-year time period if the participant has still not met self-sufficiency and, in the opinion of the service provider staff, additional progress can be obtained through continued follow-up.

## 7. Definitions

**Follow-up:** Any contact with an individual to ensure retention or identify barriers once they have exited the program

**Exited WIOA:** A participant exits after the participant goes 90 days without receiving any services other than self-service, informational, or follow-up and there are no future services planned other than follow-up.<sup>12</sup>

**Date of Exit:** The last date that a non-follow-up service was provided.

## 8. Related Policies and Documents

EmployIndy *WIOA Participant Eligibility Policy*<sup>13</sup>

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<sup>11</sup> See 20 C.F.R. § 681.580.

<sup>12</sup> [http://www.in.gov/dwd/files/Interim\\_Guidance\\_WIOA\\_Services\\_Participation\\_Exit\\_final.pdf](http://www.in.gov/dwd/files/Interim_Guidance_WIOA_Services_Participation_Exit_final.pdf)

<sup>13</sup> <https://employindy.org/wp-content/uploads/2017/08/1-1-1-WIOA-Participant-Eligibility.pdf>

## Attachment A

### Follow-Up Services in Indiana Career Connect (ICC)

Activity Code	Activity Title	Provider Type
F01	Referral to Community Resources	PS – Office Services
F02	Referral to Medical Services	PS – Office Services
F03	Tracking Progress on the Job	PS – Office Services
F04	Work-Related Peer Support Group	PS – Other
F05	Assistance securing better paying job	PS – Office Services
F06	Career development and further education planning	PS – Office Services
F07	Assistance with Job/Work Related Problems	PS – Office Services
F08	Adult Mentoring	PS – Other
F09	Tutoring	PS – Training Non-ITA
F10	Leadership Development	PS – Training Non-ITA
F11	Other Follow Up Service, not classified	PS – Office Services
F12	SS- Transportation	SS – Transportation
F13	SS- Purchase work related uniforms/attire	SS – Other
F14	SS- Work related tools	SS – Other
F15	SS- Housing Assistance	SS – Shelter
F16	SS- Utilities	SS – Other
F17	SS- Dependent Care	SS – Child Care
F18	SS- Medical	SS – Medical
F19	SS- Incentives/Bonus	SS – Incentives