LOCAL INSTRUCTION NUMBER 23-19

To: Local Workforce Development Area

Subject: Follow-Up Services for WIOA Title I Program Participants

Issuance Date: 12/15/2023

Effective Date: 12/15/2023

Background：To provide guidance regarding follow-up services for Workforce Innovation and Opportunity Act (WIOA) Title I program participants, including requirements for collection of supplemental wage data and SC Works Online Services (SCWOS) data entry requirements for employment-related training for WIOA Title I programs.

References:
- State Instruction 20-11
- Catawba Statement of Work Adult, DW, and Youth
- Workforce Innovation and Opportunity Act, Public Law 113-128, 55 129(c)(2)(I), 134(2)(A)(1)(xiii)
- 20 CFR 55 677.175, 678.430, 680.150, 681.460, 681.580
- Training and Employment Guidance Letters (TEGLs) 10-16, Change 1; 19-16; 21-16; 26-16

Background: Under WIOA, follow-up services are one of three types of career services authorized for adults and dislocated workers, and are a required element of youth program design. States and local areas must provide follow-up services for adults and dislocated worker participants, who are placed in unsubsidized employment, for up to 12 months after the first day of employment. For WIOA youth, follow-up services must be provided for no less than 12 months after the completion of participation.

For the Adult, Dislocated Worker, and Youth programs authorized under WIOA Title l, the exit date is the last day of service. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services that trigger participation; services do not include follow-up services. Additionally, this also requires that there are no plans to provide the participant with future services.

South Carolina has volunteered to participate in the Department of Labor's (DOL) Quarterly Report Analysis (QRA) pilot. The intent of the QRA is to improve data quality and provide consistent aggregate views of the state's data to identify performance areas in need of improvement. Upon initial review of performance data, South Carolina met all expectations with exception of training-related employment. DOL's benchmark for adult, dislocated worker, and youth training-related employment is 36%, 31%, and 20-70% respectively. However, South Carolina's program year 2019 performance levels for training-related employment were lower than anticipated at 26.3% for adults, 20.4% for dislocated workers, and 24.2% for youths.

Policy: Follow-up career services are provided to ensure that adult and dislocated worker participants are able to retain employment, obtain wage increases, and to advance in careers. Follow-up services to youth participants are to ensure that youths are successful in employment or postsecondary education and training.

WIOA staff must document follow-up services in SCWOS by recording the appropriate activity or service and entering an accompanying case note. 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 1st and March 31st, the first quarter after exit would be April 1st through June 30th. **A follow-up contact must be completed within the quarter in which the contact is due.**

Adult Program and Dislocated Worker Program Participants

Follow-up services must be provided for adults and dislocated worker participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment. Services may begin immediately following placement into unsubsidized employment if it is expected that the participant will not receive any future services other than follow-up services. Follow-up services include counseling regarding the workplace.

Follow-up services do not extend the date of exit in performance reporting. Follow-up career services for the Adult and Dislocated Worker programs are not a qualifying service for the receipt of supportive services, i.e., an individual who is only receiving follow-up services may not receive supportive services.

Youth Program Participants

Follow-up services are 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. All youth participants must be offered an opportunity to receive follow-up services that align with their Individual Services Strategies OSS). 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.

Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise. Follow-up services include the following program elements:

- Supportive services;
- Adult mentoring;
- Financial literacy education;
- 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
- Activities that help youth prepare for and transition to postsecondary education and training.

The types of services provided, and the duration of services, must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant. 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 may begin immediately following the last expected date of service in the Youth program when no future services are scheduled.

Direct Unemployment Insurance Wage Match and Supplemental Wage Information

Two methods for collection of data for employment-related performance indicators are available for determining a participant's status in unsubsidized employment and quarterly earnings:

- Direct Unemployment Insurance (UI) Wage Match
- Supplemental Wage Information

Direct UI wage match is the primary data source for verifying participant outcomes for purposes of calculating levels of performance for the employment-related indicators. Direct UI wage match must be used when available. UI wage records include private sector and government employer wage reports, such as: state government employment records, local government employment records, judicial employment records, and public school employment records.

While most forms of employment in South Carolina's workforce are reported via employer tax filings in South Carolina's State Unemployment Insurance System (SUITS), certain types of employers and employees are excluded from coverage under federal and state UI laws. For program participants engaged in these types of employment, and for participants who do not have a social security number (SSN) on record, supplemental wage information and wage data from other reliable sources may be used to collect employment-related data necessary for calculating levels of performance.

Note: The same data collection method must be used for both wages and employment status for a given reporting period.

- If a direct wage match is used, then the same direct wage match record must be used for both wages and employment status.
- If supplemental wage information is used, then the same supplemental wage information must be used for both wages and employment status.
- The same data collection method is not required for multiple reporting periods—for example, when the individual's employment status changes, making the employment and wage verification method initially used not practicable or ideal.

Individuals for whom a quarterly wage record match would not be available include, but are not limited to:

- Federal employees;
- Military employees; or
- Individuals who are self-employed.

Acceptable forms of supplemental wage information, relevant to the core program, include, but are not limited to, the following:

- Tax documents, payroll records, and employer records such as:

- Copies of quarterly tax payment forms to the IRS, such as a Form 941
- (Employer's Quarterly Tax Return)
- Copies of pay stubs (minimum of two pay stubs)
- Signed letter or other information from the employer on company letterhead attesting to an individual's employment status and earnings
- Other supplemental wage records such as the Work number or i2verify
- Follow-up survey (self-reported) from program participants o Income earned from commission in sales or other similar positions o Detailed case notes verified by employer and signed by the counselor, if appropriate to the program o Automated database systems or data matching with other partners with whom data sharing agreements exist o One-Stop operating systems' administrative records, such as current records of eligibility for programs with income-based eligibility (e.g., Temporary Assistance for Needy Families (TANF) or Supplemental Nutrition Assistance Program (SNAP)
- Self-employment worksheets signed and attested to by program participants
- Completed Signed Employment verification form (this form can be completed by Career Advisor or submitted to employer for completion). Note: If completed by Career Advisor it must be signed by career advisor and date of completion must be documented on the form

Staff must report a participant's status in unsubsidized employment during the second quarter and fourth quarter after exit. A participant's quarterly earnings may only be reported for calculation of median earnings during the second quarter after exit upon direct wage record match or collection of supplemental wage information. Additionally, either a direct wage record match or supplemental wage information is required to determine a participant's employment status in the fourth quarter after exit.

Note: When using supplemental wage data, only wages that are actually paid to the participant during the quarter can be used to calculate the participant's quarterly earnings used for reporting the median earnings indicator in the second quarter after exit.

Deadlines for Timely Collection of Data for Employment-Related Performance Indicators

Exit Quarter	Report Employment Rate – 2nd Quarter (including Youth) by End of:	Report Employment Rate – 4th Quarter (including Youth) by End of:	Report Median Earnings by End of:	Report Credential Attainment (Employment) – within 1 Year after Exit by End of:
Quarter 1: Jul. 1 – Sep. 30	Next PY, Q1 (4 quarters later)	Next PY, Q3 (6 quarters later)	Next PY, Q1 (4 quarters later)	Next PY, Q3 (6 quarters later)
Quarter 2: Oct. 1 – Dec. 31	Next PY, Q2 (4 quarters later)	Next PY, Q4 (6 quarters later)	Next PY, Q2 (4 quarters later)	Next PY, Q4 (6 quarters later)
Quarter 3: Jan. 1 – Mar. 31	Next PY, Q3 (4 quarters later)	Second PY after Exit, Q1 (6 quarters later)	Next PY, Q4 (4 quarters later)	Second PY after Exit, Q1 (6 quarters later)
Quarter 4: Apr. 1 – Jun. 30	Next PY, Q4 (4 quarters later)	Second PY after Exit, Q2 (6 quarters later)	Next PY, Q4 (4 quarters later)	Second PY after Exit, Q2 (6 quarters later)

The optimal time to collect supplemental wage information is as soon as possible following the close of the second and fourth full quarters after exit. When staff know or predict that UI wage data will not be available for individuals (e.g., the participant did not provide a SSN or the participant received self-employment training), staff must begin collection of supplemental wage information as soon as possible following the end of the second and fourth quarters after exit.

Timeline for Commencing Data Collection for Employment-Related Performance Indicators		
Performance Indicator	UI Wage Data Becomes Available	Collection of Supplemental Wage Information May Begin
Employment Rate – 2nd Quarter after Exit (including Youth)	During 3rd or 4th Quarter after Exit	Beginning 3rd Quarter after Exit
Employment Rate – 4th Quarter after Exit (including Youth)	During 5th or 6th Quarter after Exit (Next PY, 1st or 2nd quarter)	Beginning 5th Quarter after Exit
Median Earnings – 2nd Quarter after Exit	During 3rd or 4th Quarter after Exit	Beginning 3rd Quarter after Exit
Credential Attainment – Within 1 Year after Exit	During 2nd or 3rd Quarter after Exit	Beginning 2nd Quarter after Exit

Note: Program staff should remind participants, before program exit, that they or their employers may be contacted to obtain confirmation of employment status and earnings, and to explain the expected timeframe for those follow-up contacts. While this is true of all participants, it is especially important for those participants for whom UI wage data are not available.

Training-Related Employment Data Entry into SCWOS

South Carolina's Program Year 2019 performance levels for training-related employment were lower than anticipated due to a lack of reporting of follow-up data. In order to successfully track participants in training-related employment, staff must indicate the employer that the participant is employed with and whether or not the participant is in training-related employment on the employer's information screen.

To enter this information, staff must access the "Follow-Ups" section of the WIOA application and select the quarter in which the follow-up is being Follow-ups conducted. From this screen, staff may edit contact information, manage alternate contacts, and record contact attempts.

Under the "Follow-up Employment Information" section, staff can indicate that a participant is employed. Staff may select an employer from a previous quarter, or if no employer is already entered into SCWOS, staff must "Add Employer" by filling in the required information on the "Add Employer" screen.

Follow-up Employment Information

Employer Name: No Employment information

*Worked in Quarter 4/1/2021 -   ○ Yes ○ No
6/30/2021?

Use primary employer from previous ☐ Yes
quarter?

⟹ **[Add Employer]**

taff must fill out the necessary employer information and select the appropriate response in
he "Training-Related Employment" drop-down menu.

*Is this considered Training Related
Employment?

None Selected	▼

None Selected
Yes
No
Training Did not impart Job-Specific skills
Relationship of employment to training cannot be determined

~~Save~~   ~~Cancel~~

Entering Follow-up Codes

When completing follow-up the proper F codes must be entered. If staff provides any additional services during follow-up, ensure the relevant code is entered at the time of services.

F00	Follow up Services Provided	Case managers must follow local area policies in determining eligibility for receipt of follow-up services. In general, payment for follow-up supportive services with WIOA funds is approved only when the service is needed to remove a barrier to participation in education or employment after exit. Follow-up services funded by WIOA should only be provided after other resources such as family, friends, DSS and other partner agencies have been exhausted. Follow-up services may be provided up to one year after exit if allowed by the local area policy. Access to Follow-up service records is available after Case Closure has been entered into SCWOS.	1 Day Maximum	196
F01	Referral to Community/Medical Services	Case managers must follow local area policies in determining eligibility for receipt of follow-up services.	1 Day Maximum	196
F03	Tracking Progress in Employment/Education	Case managers must follow local area policies in determining eligibility for receipt of follow-up services.	1 Day Maximum	196
F04	Work-Related Peer Support Group	Case managers must follow local area policies in determining eligibility for receipt of follow-up services.	1 Day Maximum	196
F05	Assistance Securing a Better-Paying Job	Case managers must follow local area policies in determining eligibility for receipt of follow-up services.	1 Day Maximum	196
F06	Career Development/Further Education Planning	Case managers must follow local area policies in determining eligibility for receipt of follow-up services.	1 Day Maximum	196
F07	Assistance with Work Related Problems	Case managers must follow local area policies in determining eligibility for receipt of follow-up services.	1 Day Maximum	196
F11	COVID 19 Affected Unemployment	Case managers must follow local area policies in determining eligibility for receipt of follow-up services.	1 Day Maximum	99

Action: Please ensure that all appropriate staff receive and understand this policy guidance.

Inquiries: Questions may be directed to Amanda Baker at abaker@catawbacog.org.

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