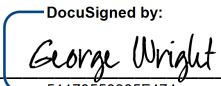


**Local Workforce Innovation And Opportunity (WIOA) Policy No. 2023-PL-02**

To: All Delegate Agencies, American Job Centers and Sector Centers

From: 
George Wright, CEO
Chicago Cook Workforce Partnership (The Partnership)

Subject: Follow-up Policy for WIOA Adult and Dislocated Worker Participants

Date: March 19, 2024

Purpose:

The purpose of this communication is to establish policy and provide guidance to delegate agencies on the implementation, and management of their follow-up systems as required under the Workforce Innovation and Opportunity Act (WIOA).

References:

WIOA sec. 134 (c) (2) (A) (xiii)
20 CFR 678.430 (c) – adult/dislocated worker

Background:

20 CFR 678.430 (c) specifies that follow-up services for Adult and Dislocated Workers, must be **made available** for a minimum of 12 months after the first day of employment, to registered participants who are placed in unsubsidized employment.

Policy:

1. Training and Employment Guidance Letter (TEGL) 19-16 requires that Follow-up services **must be provided** for up to twelve (12) months **after the first date of employment** for adults and dislocated workers who are **placed in unsubsidized employment**.
 - a. For participants in work-based learning opportunities that result in unsubsidized employment, such as On-the-Job Training (OJT), this would be the first day after the OJT is no longer subsidized by local area funds.
2. Follow-up services are tied to the first date of unsubsidized employment and are not tied to the date of program exit for adults and dislocated workers who have been placed in unsubsidized employment.

Chicago Cook Workforce Partnership
Minimum Requirements for Follow-up Services
Page 2

3. Follow-up services are not allowed under the Workforce Innovation and Opportunity Act (WIOA) when an Adult or Dislocated Worker does not obtain unsubsidized employment.
4. Follow-up services are provided in support of unsubsidized employment, whereas Career and Training Services support the Participant's ability to enter unsubsidized employment.
5. At the point adults and dislocated workers are placed in unsubsidized employment during program participation, the career coach must transition the participant into follow-up services when the last service has been received, and no future services are planned.
 - a. This allows the career coach to provide follow-up services during the ninety (90) day program exit clock so that if the participant needs additional assistance, it can be provided even though they already started follow-up since they are still a participant.
 - 1) If the participant needs services within the ninety (90) day timeframe, the follow-up can count as career planner contacts.
6. When an adult or dislocated worker participant obtains unsubsidized employment while still receiving an active, open WIOA service, currently, Career Connect does not allow a Follow-Up Service to be opened; however, follow-up must be provided.
 - a. In this instance, documenting the follow-up in Case Notes should be included and recorded during the routine, two-way communication between the Career Coach and the participant.
 - 1) Career Coaches should enter case notes along the lines of “transitioned to follow-up services today, as the participant is done receiving services” or “closed this case administratively (not an exit) and am moving into follow-up because the participant needs no more services.”
 - b. Only when the individual completes Career, Training, and Supportive Services planned and outlined in the Individual Employment Plan (IEP) and the services are closed can a career coach open a follow-up service and enter a case note of the action in Career Connect.
 - c. Career Coaches must understand program exit, which is ninety (90) days after the last enrolling service has been closed, is separate from providing follow-up services for adults and dislocated workers.
7. Follow-up services must be provided as appropriate.
 - a. Participants with multiple employment barriers and limited work histories may need more significant follow-up services.
 - b. Additionally, this helps to identify an area of weakness that will affect their ability to progress further in their occupation or in retaining employment.
 - c. A variety of follow-up services may meet the needs of the participant. Below is a list of activities, but is not limited to the following:

- 1) Counseling individuals about the workplace;
 - 2) Contacting individuals or employers to help secure better-paying jobs, additional Career Planning, and counseling for the individual;
 - 3) Assisting individuals and employers in resolving work-related problems;
 - 4) Connecting individuals to peer support groups;
 - 5) Providing individuals with information about additional educational or employment opportunities; and
 - 6) Providing individuals with referrals to other community resources.
8. The documentation addressing the need and type of the activities provided in follow-up must be entered into general case notes.
- a. Case notes are not to be added to the Individual Employment Plan (IEP) or any other enrolling service such as Career Planning and will alter the true last day of services and, therefore, the exit date.
- 9. Supportive services cannot be provided in association with follow-up services for WIOA Adult and Dislocated Worker participants.**
- a. However, a participant could receive supportive services associated with an active enrolling career and/or training service if they are concurrently receiving Follow-up Services following the first date of unsubsidized employment.**
10. After ninety (90) days following exit, if a former participant is not responsive, cannot be located, or refuses to provide information, the career coach may close follow-up services.
- a. The case notes must document the unresponsiveness of the former participant as the thirty (30) day contact requirements outlined in our Case Notes Guide.
11. Upon completing all follow-up services, the service must be closed, and the end date populated in Career Connect.