



NEMO WDB Issuance 10-2017

ISSUED:

EFFECTIVE:

To: All Program Operators
From: Diane Simbro, Executive Director
Subject: Follow-Up Services – Youth

Purpose: The purpose of this issuance is to provide further guidance on policies to be followed by NEMO WDB sub-recipients when providing follow-up services to Youth.

Background: 20 CFR § 681.580 describes follow-up services as critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training. The follow-up services will provide continued support for the Youth to ensure assistance and guidance with the outcome goal of employment, enrollment in education, or registered apprenticeship. The follow-up services are also provided to assist the Youth in gaining needed life skills to assist them in becoming successful through career guidance and counseling.

Substance: The information contained herein follows the WIOA Final Rule, establishing the policy and the need for Local Boards to establish policy on this subject.

Action: This Issuance is effective immediately. Please distribute to appropriate individuals.

References: WIOA Regulations at 20 CFR part 681
Training and Employment Guidance Letter 21-16 (dated March 2, 2017)

Rescissions: NEMO WIB Issuance 05-2006 Change 1

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FOLLOW-UP POLICY FOR YOUTH

Follow-up services [20 CFR § 681.580] are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training. All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies, unless the participant declines to receive these services or cannot be located or contacted. In that case, the case manager needs to fully document in the State Case Management System Service Notes. NEMO WDB requires no less than three (3) attempts to contact the participant. Multiple methods of attempting to locate youth must be made and those methods documented in the State Case Management System. Using the same method of contact to the same location for all three (3) or more contacts is not acceptable. The case manager must demonstrate that all efforts were made by utilizing phone, mail, email, social media, friends, emergency contact, while being mindful of confidentiality policies.

At time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit. If, at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services, they may do so. This must be documented in the State Case Management System Service Notes.

Follow-up services may begin immediately following the last expected date of service in the Youth program. Follow-up services do not cause the exit date to change and do not trigger re-enrollment in the program.

The exit date is determined when the participant has not received services in the Youth program or any other DOL funded program in which the participant is co-enrolled for 90 days and no additional services are scheduled. At that point, the date of exit is applied retroactively to the last date of service. Once the 90 days of no services, other than follow-up services, self-service, and information-only services and activities, has elapsed and the participant has an official exit date applied retroactively to the last date of service, the program continues to provide follow-up services for the remaining 275 days of the 12-month follow-up requirement. The 12-month follow-up requirement is completed one year from the date of exit and noted in the State Case Management System Service Notes.

Case managers must contact participants in follow-up at least once each quarter following exit and document the follow-up in the State Case Management Service Notes. Follow-up services **must include** more than: (1) a contact attempted or (2) an appointment made to secure documentation in order to report a performance outcome. NEMO WDB requires that case managers make every effort to locate and contact by any means possible, i.e. phone, mail, email, social media, emergency contact, while being mindful of confidentiality policies. All contact attempts shall be documented in the State Case Management System Service Notes.

Follow-up services may be provided beyond the 12 month period at the discretion of the NEMO WDB. The case manager must submit a request to continue services to the NEMO WDB Director with justification of the extension. 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 provided to youth should be services, which connect participants to training and employment. Follow-up services for youth may include, but are not limited to:

- (1) Supportive service activities, [CFR 20 § 681.570] (*Refer to NEMO WDB Supportive Service Issuance for allowable supportive services*) which may include:
 - a) Linkages to community services
 - b) Assistance with transportation
 - c) Assistance with child care and dependent care
 - d) Assistance with housing
 - e) Assistance with educational testing
 - f) Reasonable accommodations for youth with disabilities
 - g) Legal aid assistance
 - h) Referrals to health care
 - i) Assistance with uniforms or other appropriate work attire and work related tools, including eyeglasses and protective eye gear
 - j) Assistance with books, fees, school supplies, and other needs for enrollment into post-secondary education classes
 - k) Payments/fees for employment and training related applications, tests, and certifications
- (2) Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- (3) Assistance in securing better paying jobs, career pathway development, and further education or training;
- (4) Work-related peer support groups;
- (5) Adult mentoring [20 CFR § 681.490] – mentoring must last at least 12 months and may take place both during the program and following exit from the program. It must be a formal relationship between the Youth and an adult mentor that includes structured activities, where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee. The Final Rule states that while group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the case manager must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis. Mentoring may include workplace mentoring where the case manager matches a youth participant with an employer or employee of the company. NEMO WDB requires the sub-recipient vet the mentor through the appropriate channels, i.e. school system, law

enforcement, family services database, partner agencies, MOCASENET, or other applicable agency/method and document in the file. DOL acknowledges that in a few areas of the country, finding mentors may present a burden to a program. While they strongly prefer that case managers not serve as mentors, the Final Rule allows case managers to serve as mentors in areas where adult mentors are sparse. This must be justified and documented in the State Case Management System Service Notes.

(6) Services necessary to ensure the success of youth participants in employment and/or postsecondary education. [20 CFR § 681.460] These services include exploring post-secondary education options including technical training schools, community colleges, 4-year colleges and universities, and registered apprenticeship. Additional services could include assisting the youth to prepare for the ACT/SAT testing, assisting with college admission applications, searching and applying for scholarships and grants, filling out Financial Aid applications and adhering to changing guidelines.

(7) Financial literacy education. [20 CFR § 681.500] Financial literacy education may include the following activities:

- a) Assistance in creating budgets, initiating checking and savings accounts at banks, and making informed financial decisions;
- b) Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- c) Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of the report and correct; and how to improve or maintain good credit;
- d) Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities to make informed decisions;
- e) Educate participants about identity theft, ways to protect themselves from identity theft and understanding their rights and protections related to personal identity and financial data;
- f) Support activities that address the particular financial literacy needs of non-English speakers;
- g) Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
- h) Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability;

(8) Provision of labor market information and employment information about in-demand industry sectors or occupations. [20 CFR § 681.460] NEMO WDB has determined the following Sectors to be in demand in the Northeast Region; Advanced Manufacturing, with an emphasis on welding, Healthcare, Transportation and Logistics, and Agriculture related occupations;

(9) Comprehensive guidance and counseling. [20 CFR § 681.510] This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate. When referring to a partner, the case manager shall coordinate with the partner to ensure continuity of service. WIOA maintains that case management is more than a simple referral. The case manager needs to work with both the referral agency and the youth;

(10) Leadership development, [20 CFR § 581.520] which could include: a) opportunities that encourage responsibility, employability and other positive social behaviors, such as: exposure to post-secondary educational opportunities; community and service learning projects; peer-centered activities, including peer mentoring and tutoring; and organizational and teamwork training, including team leadership training;

(11) Entrepreneurial skills training [20 CFR § 681.560] providing the basics of starting and operating a small business. This could involve developing such skills as: (a) taking initiative; (b) creatively seeking out and identifying business opportunities; (c) developing budgets and forecasting resource needs; (d) understanding various options for acquiring capital; (e) communicating effectively and marketing the business and ideas; (f) developing a business plan; and (g) seeking financing through small loans or grants;

(12) Career Awareness/Career Exploration, which begins the process of developing knowledge of the variety of careers and occupations available, their skill requirements, working conditions and training pre-requisites and job opportunities across a wide range of industry sectors. This process will assist the youth in choosing an educational path, training, or employment that fits their interests, skills, and abilities.

Additional Notes on Documenting and Reporting Program Elements

Provision of the above program elements must occur after the exit date in order to count as follow-up services. Case managers will ensure they code the follow-up services correctly in the case management system in order to clearly differentiate follow-up from regular program services. In addition, each follow-up service should be documented in Service Notes as post-exit.

Documenting receipt of program elements is critical to ensure the youth who are actively participating in programs are not unintentionally exited due to the 90 days of no service. All 14 Youth program elements are contained in the PIRL and case managers should ensure that services received are reported in the applicable program element in the PIRL.

In addition, note that case management is not a program element. Case managers providing case management should not be reported as one of the 14 program elements in the PIRL.