

# **PASSAIC COUNTY WORKFORCE DEVELOPMENT BOARD**

**Subject: WIOA Title I Follow-up Service (Adult, Dislocated Worker)**

**Effective Date:** 05/08/26

## **PURPOSE**

Under the Workforce Innovation and Opportunity Act (WIOA), follow-up services for Adult and Dislocated Worker (ADW) participants are designed to ensure job retention and career advancement after they exit the program and enter unsubsidized employment.

## **BACKGROUND**

WIOA Title I follow-up services are non-monetary career services designed to support participants after they exit the program, helping them retain employment, increase wages, and advance in their careers. These services must be made available for a minimum of 12 months after a participant exits the program.

Adult and Dislocated Worker Services

For these groups, follow-up services focus on individuals who have obtained unsubsidized employment.

- **Eligibility:** Primarily for participants who have exited the program and are placed in unsubsidized employment.
- **Duration:** Must be made available for up to 12 months after the first day of employment.
- **Services:**
  - Workplace counseling and career planning.
  - Assistance with work-related problems.
  - Referrals to other community resources.

## **POLICY**

The Passaic County Workforce Development Board adopts the following federal and NJDOL policies and implements in the local area to provide comprehensive follow-up services to participants who secure unsubsidized employment, The purpose of the policy is to establish a structured approach for assessing and identifying follow-up support for participants in workforce development initiatives. The policy aims to enhance job retention, career advancement, and overall participant satisfaction. The AJC/One-Stop

Carrer Center partners will follow procedures to provide services which align with the federal and NJDOL requirements identified in this policy. Services will be tailored to individual needs and will utilize specific tools and methods for effective assessment and support. The policy applies to all participants in adult and dislocated worker programs administered by the Workforce Development Board.

#### Federal WIOA Follow-Up Policies

The WDB follows federal guidelines found in TEGL 19-16, 20 CFR § 678.430(c) and 20 CFR 680.150, establishing the following baseline for follow-up services:

- **Availability:** Follow-up services must be made available for a minimum of 12 months after the date of exit for participants who have entered unsubsidized employment.
- **Voluntary Nature:** While these services must be offered but are not mandatory for all participants. Individuals may opt-out or decline services at any time.
- **Types of Services:** Allowable services include workplace counseling, peer support groups, information about additional educational opportunities, and assistance with work-related problems.
- **Documentation:** Follow-up contacts must be more than just "data collection" for performance reporting; they must involve a meaningful two-way exchange and provide actual support.

#### NJDOL State Policies

The NJWIN WD-PY21-5 Placement, Exit, and Follow-up Procedures and NJWIN WD-PY25-8 WIOA Required Local Policies are a New Jersey Department of Labor directives adopted by the Workforce Development Board to establish and maintain prescribed policies and procedures for follow-up services applying to Adult and Dislocated Worker participants after they exit the program.

#### ADW Follow-Up Requirements

Follow-up services for ADW participants are required by the WDB and are designed to ensure job retention and career advancement.

- **Duration:** Follow-up services must be available for at least 12 months after the participant's first day of unsubsidized employment or their program exit date.
- **Minimum Contact:** Staff are typically required to attempt contact at least once every three months (quarterly) throughout the 12-month period.

- Service Types: Allowable services include:
  - Workplace Counseling: Guidance on workplace dynamics and resolving work-related challenges.
  - Career Planning: Assistance with seeking better-paying jobs or additional educational opportunities.
  - Supportive Services: Limited support such as bus passes or work attire may be provided if they are necessary to help the individual retain their job.
  - Employer Contact: Direct communication with the employer to address performance issues or verify employment (requires participant consent).

#### Documentation & Compliance

- Recording: All follow-up attempts—successful or not—must be documented in the state’s management system (such as AOSOS or IGX/Intelligrants) with specific case notes detailing the method and outcome of the contact.
- Opt-Out Provision: Participants have the right to opt out of follow-up services at any time. This decision must be documented in their case notes and typically requires an "informed choice" acknowledgment.
- Termination of Services: If a participant remains unreachable after multiple attempts over a set period (e.g., six months), staff may terminate follow-up efforts, provided they have exhausted all known contact methods.

#### ADW Follow-Up Case Note Template for AOSOS/IGX entries

The follow-up case note should be concise, objective, and clearly state whether the participant is still employed or needs further assistance.

Subject: 12-Month Follow-Up: [1st/2nd/3rd/4th] Quarter Contact

Contact Method: [Phone / Email / Text / In-Person / Employer Verification]

Contact Status: [Successful / Unsuccessful]

#### Observation/Summary:

- Employment Status: [Currently employed at [Company Name] / Currently Unemployed / Seeking new opportunities].
- Job Retention: [Participant reports being satisfied with the role / Participant is facing [specific challenge] at work].
- Wages/Hours: [Confirmed current hourly wage and average hours per week].

- Supportive Services: [Discussed need for transportation assistance, tools, or uniforms? Yes/No].
- Career Advancement: [Discussed potential for promotion or additional training? Yes/No].

Action Plan/Next Steps:

- [e.g., Scheduled next quarterly follow-up for [Date]].
- [e.g., Provided participant with a referral for [Resource]].
- [e.g., Participant remains in "Active Follow-Up" status].

Staff Signature/ID: [Name/ID]

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Under NJ Department of Labor guidelines, specifically the WD-PY25-8 (WIOA Required Local Policies) framework, follow-up services for Adult and Dislocated Worker participants may be discontinued if a participant is unreachable after a documented "diligent effort."

Requirements for Discontinuation Due to No Contact

To legally "close" or terminate follow-up services because a participant is unreachable, you must typically meet the following criteria:

- Quantity of Attempts: A minimum of three (3) unsuccessful contact attempts must be made within a single follow-up quarter before services can be discontinued for that period.
- Method Variety: Attempts must utilize multiple available methods (e.g., calling all known phone numbers, sending an email, and sending a letter/postcard to the last known address).
- Timeframe for Termination: If a participant remains unreachable after multiple attempts over six (6) consecutive months (two quarters), the local board may authorize the permanent termination of follow-up services.
- Final Notification: Many local policies require a final "Intent to Close" letter or notice sent to the participant's last known address, informing them that their follow-up services will be discontinued unless contact is made.

Documentation for AOSOS/IGX

Before closing the case, case note must provide an "audit trail" that includes:

- Dates and times of every specific attempt.
- Contact methods used (e.g., "Left VM on primary cell," "Email sent to address on file").
- Specific outcomes (e.g., "Phone disconnected," "Letter returned to sender/undeliverable").
- Other Valid Reasons for Early Closure

Outside of being unreachable, follow-up can be terminated early if:

- Informed Choice (Opt-Out): The participant explicitly states (preferably in writing) they no longer want services.
- Global Exclusion: The participant becomes deceased, incarcerated, or has a medical condition lasting longer than 90 days.
- Relocation: The participant has moved out of state with no intention of returning.

Under the WD-PY25-8 framework and federal WIOA guidelines, follow-up services can be officially terminated before the 12-month mark using two primary mechanisms: Global Exclusions (situations beyond the program's control) or Informed Choice (the participant's voluntary decision to opt-out).

- Global Exclusions (Performance Neutral)

A "Global Exclusion" occurs when a participant's circumstances prevent them from working or participating in follow-up. These exclusions are "performance neutral," meaning the participant is removed from the local area's performance calculations.

Common Global Exclusion Reasons:

- Institutionalized/Incarcerated: The participant is in a correctional facility or a 24-hour support facility (e.g., hospital, treatment center) for at least 90 days.
- Health/Medical: A medical condition or treatment lasting longer than 90 days that precludes employment or participation.
- Deceased: The participant has passed away.
- Military Reservist: The participant is called to active duty for at least 90 days.

Case Note Template for Global Exclusion:

Subject: Case Closure – Global Exclusion: [Reason]

Date of Determination: [Date]

Documentation Source: [e.g., Official medical note, court records, obituary, military

orders]

Summary: Participant is being exited from follow-up services due to [Reason].

Documentation has been verified and uploaded to [AOSOS/IGX]. Participant is no longer able to engage in program services for a period exceeding 90 days.

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#### Informed Choice (Voluntary Opt-Out)

Participants have the right to decline follow-up services at any time. This decision must be informed, meaning the staff explained the benefits of follow-up (such as job retention support) before the participant declined.

#### Requirements for Opt-Out:

- **Written Request:** Staff should ask the participant to provide the request via email or written notice.
- **Verbal Alternative:** If they refuse to write it, staff must document the verbal refusal in detail in AOSOS.
- **No Solicitation:** Staff must not encourage participants to opt-out to reduce their caseload.

#### Informed Choice / Opt-Out Template:

Subject: Participant Opt-Out of Follow-Up Services

Date of Request: [Date]

Communication Method: [Email / Signed Form / Verbal Conversation]

Summary: The available follow-up services were discussed with the participant, including career planning, workplace counseling, and potential supportive services for job retention. The participant has made an informed choice to decline these services at this time.

Reason Given:

Action: Follow-up services have been discontinued. Participant was informed they may contact the One-Stop in the future if their needs change.

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#### Summary of Documentation for IGX/AOSOS

To ensure compliance during an NJDOL audit, ensure the file contains:

- **For Exclusions:** Proof of the condition (e.g., medical documentation).

- For Opt-Outs: A record of the email or a copy of the signed "Follow-Up Opt-Out" form in the paper/digital file.
- Quarterly Contact: At a minimum, follow-up contact attempts should be made once per quarter for Adult and Dislocated Worker participants.
- AOSOS Recording: All follow-up activities, attempts, and outcomes must be recorded in the AOSOS (America's One-Stop Operating System) database.
- Immediate Start: Follow-up can begin immediately after the last date of service if no future services (other than follow-up) are scheduled, even before the formal 90-day "soft exit" is finalized.
- Supportive Services: NJ policy allows for supportive services (e.g., transportation assistance) to continue during the follow-up period if necessary to maintain employment, provided they do not extend the official program participation date.

#### Compliance Monitoring by the WDB

WIOA follow-up plan for the local area must align with NJWIN WD-PY21-5, which mandates that services be success-oriented and not merely for data collection. Below are the WDB requirements for the local area, a template and a checklist for local area compliance monitoring by the WDB.

- Program Objective & Scope- Providing at least 12 months of follow-up services to ensure job retention and career advancement for all exited Adult and Dislocated Worker (ADW) participants.
  - Mandatory Offer: Confirm that all participants are informed of follow-up availability at the time of enrollment.
  - Opt-Out Provision: Defined how a participant can decline services (e.g., in writing or via documented case note in AOSOS).
- Frequency and Methods of Contact-Meaningful interaction, with specific minimums for contact attempts:
  - Minimum Frequency: At least one contact attempt per quarter for 12 months post-exit.
  - Attempt Threshold: Local policies require three distinct attempts (e.g., phone, email, letter) per quarter before a participant is considered "unreachable" for that period.
  - Permissible Methods: Telephone, in-person meetings, email, social media, or written correspondence.

- Allowable Follow-Up Services- Supports provided in the local area. Supports must involve a two-way exchange.
  - Workplace Support: Counseling regarding the workplace, assistance with work-related problems, and regular contact with the participant's employer (with signed consent).
  - Career Advancement: Labor market information and on in-demand industry sectors, career planning, and assistance in securing better-paying jobs and help with raises/promotions
  - Financial Literacy: Budgeting assistance or long-term financial planning for newly employed individuals.
  - Supportive Services: While traditional supportive services (like gas cards) typically end at exit, specific follow-up supportive assistance is permissible if a job is at risk.
- AOSOS Data Entry Requirements- Every action must be recorded in America's One-Stop Operating System (AOSOS):
  - Activity Entries: Use "Follow-up attempted" for unsuccessful contacts and specific follow-up service codes (e.g., F01-F22) when contact is made.
  - Outcome Field: Record details of the engagement in the "Outcome/Status" field of the Achievement Objectives tab.
  - Case Note Standards: Every attempt must have a corresponding case note documenting the date, method, and results. AOSOS case notes required to match the program completion date. Final 12-month file review before closing the record
  - Termination of Follow-Up Documentation Requirements- To pass local and state monitoring, reason for termination of follow-up must be recorded
  - Participant Request: The individual explicitly opts out.
  - Unreachable: Documented failure to contact after a specific number of attempts across multiple quarters.
  - Other Reasons: Institutionalization, health/medical issues, or death.
- Core Consent Requirements- Under NJWIN WD-PY21-5 and related state guidance, the consent process must meet standards.
  - Prior Authorization: The signed form must be obtained and uploaded into the AOSOS system before the first employer contact is made. The form is integrated in the enrollment process and included in the initial "Intake/Eligibility Packet" so it is on file before the participant exits.
  - AOSOS Documentation: When an employer is contacted, the case manager must note in AOSOS that a signed consent form is on file to justify the "two-way exchange".

- **Explicit Data Sharing:** The form should explicitly authorize the employer to share specific details, including the participant's start date, job title, and hourly wage.
- **Voluntary Participation:** Participants must be informed that providing this consent is voluntary. They can still receive other follow-up services even if they refuse to allow employer contact.
- **Employer Contact Consent Form** (often called an "Authorization to Release Information") is a critical requirement for a local WIOA follow-up plan to ensure compliance with privacy regulations. This form must be obtained before any staff member contacts an employer to verify employment or address workplace issues. Form Components to ensure the local form is legally sound and functional for NJDOL reporting, the form must include:
  - **Purpose Statement:** Clearly explain that the information is used to evaluate program success and provide retention support.
  - **Scope of Information:** A list of exactly what the employer is allowed to disclose (e.g., hours worked, benefits, and performance).
  - **Duration of Consent:** Typically matches the 12-month follow-up period required by WIOA.
  - **Revocation Clause:** A statement explaining how the participant can withdraw their consent at any time.
  - **Verification Alternative:** If a participant refuses to sign the employer consent, staff must rely on alternative verification like pay stubs, tax records, or self-attestation

## **POLICY REVISION**

The WDB Workforce Innovation and Opportunity Act (WIOA) policies are reviewed amended annually by the WDB to remain in compliance with all federal mandates and state-level policy changes issued by the New Jersey Department of Labor and Workforce Development. Partners will be notified of all policy revisions.