Cape Fear Local Policy No. P-WDB-018-2019

Subject: CFWDB Exit Policy

Purpose: To provide policy direction for preparing Workforce Innovation and opportunity Act (WIOA) participant case closure (exit) and follow-up guidance for the WIOA Title I Adult, Dislocated Worker, and Youth programs.

Policy: The CFWDB area shall follow the requirements set forth that establish program exit under WIOA and shall conduct follow-up as required under WIOA to track and promote successful completion of training and successful employment retention of WIOA Title I program participants. Performance standards are calculated from activity outcomes of participants that exit WIOA. WIOA also requires follow-up be made available to participants.

Action: To comply with Workforce Innovation and Opportunity Act (WIOA Final Rule 20 CFR 680.150, 20 CFR 681.580; TEGL 19-16, TEGL 10-16 Change 1, the attached procedures will provide case closure and follow-up guidance.

Effective: December 11, 2019

Expiration: Indefinite

Attachments: Cape Fear WDB Case Closure (Exit) and Follow-Up Policy

Contact: Cape Fear Workforce Development Board Staff

Distribution: CFWDB WIOA Providers

NC Division of Workforce Solutions

Attachment A: PR-WDB-019-2019 Procedure for Exits, Closures, and Follow-up

Section 1: Case Closures/Exits

Types of Program Closures/Exits
Exit occurs after participants receive no staff assisted services for 90 days in either Workforce Innovation Opportunity Act (WIOA) Title I, Wagner Peyser (WP), or Trade Adjustment or Assistance Act (TAA) programs (referred to as “system exit” or “soft exit”). Exit will occur automatically based on actual end dates of keyed services/activities.

Case notes should support the last date of WIOA Staff assisted services provided with activity end dates that accurately reflect the actual last service provided. In some cases, WIOA activities may be completed but the participant continues to receive WP services, which will extend program exit. Exit is often triggered by completion of training, successful transition into employment, or loss of contact—all of which should be documented in case notes with corresponding activity end dates. However, loss of contact should only be documented in a General Case Note. At the point of exit, participants will then be included in all performance calculations. See Performance Indicators section page 13.

Case Exits
A case note indicating the last service provided and formal closure of the case and the reason, i.e., no longer in need of, or able to, benefit from services, lack of participation, or customer to request to no longer participate is required. A participant will automatically system exit the program when they have not received a WIOA, WP, or TAA service for 90 consecutive days. The exit date is the last date of service with no other services planned. The only way to prevent a system exit is to provide a service before the 90th day after the last date of service. This service must be appropriate for the participant.

System Closed (Soft Exit)
Any individual that has not received documented WIOA Title I staff assisted services for 90 days will be exited according to NCWorks Online exit protocol. The definition of a "soft exit" is no staff-assisted services for 90 days which prompts the system to exit the customer automatically. The date of WIOA exit will correspond to the last day of WIOA Title I staff assisted or partner staff assisted service. This date should correspond with the date documented in the participant’s case and activity notes. The case notes should clearly state that this is the last date of WIOA or partner staff assisted service.

Note: If after exiting it is realized that a WIOA activity was not properly keyed during active enrollment, a request can be made to WDB staff for a “Program Service Insert” so that it is properly recorded. Inserting an activity does not change the exit date. WIOA Title I staff must enter a General Case Note until the file is soft exited at which time staff will begin follow-up activities. If the participant returns to NCWorks Online and performs job search, the participant’s self- services does not stop the system exit.
**System Exit**

A system exit occurs once a participant has not received any services funded by the program or partner program for 90 consecutive days and is not scheduled for future services. The date of exit is applied retroactively to the last day on which the individual received a service funded by the program or partner program. Examples of activities that do not extend the period of participation or delay program exit include Follow-Up services and any other required administrative case load management activities that involve regular contact with the participant or employer to obtain information regarding the participant’s employment status, educational progress, or need for additional services.

Once a participant has not received any WIOA-funded or partner funded services for 90 days, except follow-up services, and there is no scheduled service pending, the participant is exited. NCWorks Online will automatically exit a participant who has not received any services for 90 days when there is no scheduled service pending.

WIOA Title I staff do not manually create case closures. Workforce development staff will be responsible for this function. Only in cases of “exclusions” will this be considered, and the contractor must submit in written to request a case closure to for WDB staff approval. The activity code sheet details which codes extend exits. The P20 is available for selection prior to actual case closure/exit under the WIOA Title I application for the Adult programs only.

References:
TEGL 10-16, Change 1

**Section 2: Pre-Exit Codes For WIOA Title I Adult/Dislocated Workers Programs**

Career Advisors should use the Pre-Exit Code for the Adult/DW programs while waiting for a participant’s case file to exit from the system. Using the Pre-Exit Code will help Career Advisors to continue to document their efforts with the customer until their case file “soft exits” from NCWorks.

The Activity Service Code sheet indicates that the P20 code for the “Adult Follow-up Services for Pre-Exit” is for staff to track A/DW progress prior to the system exit. The Activity Service Code sheet indicates whether the code used extends exit dates. The P20 code does not extend exit dates. While
staff are waiting for the 90-day clock to run out, they are to use the **P20 Pre-Exit code to log their Title I interactions/services** with the customer in the meantime. The purpose of the P20 code is for staff to track A/DW follow-up services DURING that 90-day window of no "staff-assisted" services. It was created so staff would have a way of capturing the work they do with the customer while waiting for them to "soft exit" for 90 days from NCWorks.

**Note:** The Youth program does not have a Pre-Exit code to document the progress of the youth and young adults while they are waiting to be exited from the system. In this case, staff should document the last date of service for the youth customer in the Activity Code for Comprehensive Guidance and Counseling. Once this has been documented for the youth prior to the system exit then staff can continue documenting the progress of the customer in a “General Case Note” until the case file “soft exits.” We understand that the F-Codes which are the Follow up Codes for the youth program will appear after the customer has been exited from NCWorks.

### Creating Closures and Exclusions

In researching if Career Advisors are allowed to “Create Closures and Exclusions,” it was determined by the Local Area to reserve this right. There is not an official DWS policy statement regarding creating closures and exclusions; however, each local area reserves this right to put policies and procedures in place regarding program exits. The Division of Workforce Solution (DWS) staff requested that local areas do not allow contractor staff to manually “Create Closures” by closing out participant cases from NCWorks. Creating closures manually is considered to be a **hard exit.** Hard exits (creating the closure manually) would likely result in staff exiting customers pre-maturely only to have to re-enroll them again in the program if they are not truly done with receiving WIOA Title I services. Staff can be written up by the Local Area for creating closures and exclusions. The local area strongly encourages that Career Advisors adhere to the policy and procedures that are set in place in regards to closures and exclusions.

Case Closures are not allowed unless the customer falls into one of the **WIOA Title I Exclusion** scenarios. Otherwise, customers must be "soft exit" from the system to be closed out after 90 days of receiving no staff-assisted services. The Local Area Superuser will be responsible for creating the exclusion.

### Exclusions

*Equal Opportunity Employer/Program. Auxiliary Aids and Services are Available Upon Request to Individuals with Disabilities*

Cape Fear Form No. PR-WDB-019-2019  Effective Date: 12/11/2019
If the participant falls into any of the categories listed below, he/she will be exited on the date entered in NCWorks Online. Case notes and/or their documentation to support the exclusion is required. Exit reasons include:

1) **Deceased** – A participant who died during participation in a WIOA program(s).
2) **Institutionalized** – The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital.
3) **Health/Medical** – The participant is receiving medical treatment that precludes entry into unsubsidized employment or continued participation in the WIOA program(s). This does not include temporary conditions expected to last for less than 90 days.
4) **Reservists Called to Active Duty** – Reservist called to active duty who chose not to return to the WIOA program(s).
5) **Youth Participants** – Participant is in the foster care system and exits the program because he or she has been moved out of the local workforce area by the system.

**IMPORTANT**: Career Advisors must submit in writing to the Local Area Superuser that they wish to request to create a closure and exclusion for a customer. Career Advisors must state the reason for the request in writing and provide the name and state id of the customer in order to receive approval from the Superuser to create a closure and exclusion on behalf of the agency. The Superuser will notify the agency of the approval or denial in writing. The Superuser will be responsible for creating the closure and exclusion. If the agency is approved for creating the closure and exclusion then the Career Advisor is solely responsible for ensuring that all the necessary and required documentation has been secured and uploaded to NCWorks for verification purposes. The Superuser will review all the necessary documentation before the Case Closure and Exclusion is created. Once the case closure and exclusion has been created the agency will be notified.

Refer to the updated TEGL 14-18 for Exclusions. In most cases, Exclusions will only be specific “at the time of exit” and no longer in follow-up. The current plan is to leave the exclusion reason in the follow-up screen; however, it would not be used for the performance exclusion? This is a big change to how staff understands exclusion to take place one year after a customer exits the program in NCWorks. **Death** is the only exclusion that can be taken after the exit.

**Note**: GeoSol often references “other States” processes as they are a vendor all over the US. However, North Carolina’s guidance on using NCWorks with the GeoSol product is different. **Career Advisors must follow the local and state guidance for North Carolina and the Local Area.**

**Mismanagement of Exits**
Once a participant has not received any services funded by the program, or a partner program, for 90 consecutive calendar days and is not scheduled for future services, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program.
Prolonging exit due to the inability to contact a participant is inappropriate. For a detailed list of services that extend exit, please refer to the Activity Service Codes listed on NCWorks online under Staff Online Resources. Staff should refrain from prolonging an exit by using the **200 Individual Counseling Activity Code Activity Code for Adults** and **417 Comprehensive and Guidance Counseling Activity Code for Youth**. Staff can be written up by the Local Area for mismanagement of exits and possibly lose their rights to have access to NCWorks online. The local area strongly encourages that Career Advisors adhere to the policy and procedures that are set in place to ensure that exits are being conducted properly for all WIOA Title I program participants. Proper management of exits will be determined during Programmatic Reviews by local and state monitors.

**References**
TEGL 10-16, 17-05 and 22-14
20 CFR 681, 450

**Participant Transfers**
Prior to the occurrence of any participant being transferred in NCWorks Online, authorized representatives of both Workforce Development Boards must agree to the transfer. In addition, both WDBs must maintain documentation on file indicating that the completed transfer was agreed upon. This requirement can be met by retaining copies of electronic emails.

**Re-Enrollments**
If WIOA Title I participant has formally exited WIOA Title I services and is in active follow-up, they **cannot be re-enrolled** into WIOA Title I services **without written approval** from the Cape Fear Local Area. Former WIOA Title I participants who are not in active follow-up may re-enroll in WIOA Title I services following the completion of a new application where the data validation process must be completed with real-time customer information and Title I eligibility confirmed. All new/updated documentation must be uploaded into the customer’s file in NCWorks Online. Staff should consider past and current circumstances when determining if re-enrollment is appropriate.

**Section 3: Follow-up Services for Adult and Dislocated Workers**
Follow-up services are categorized as a career service and may be provided, as appropriate, for adults or dislocated workers placed in unsubsidized employment for up to twelve months after the first day of employment. Case management services in regard to the workplace is an appropriate type of follow-up service. Follow-up services do not extend the date of exit for performance reporting purposes. Please refer to WIOA Title I & III Guide Section 1-11 for additional information about follow-up services and case management.

**WIOA Adult and Dislocated Worker Follow-Up Services and Case Management**
Follow-up services may be provided, as appropriate, including case management services regarding the workplace, for participants in the adult or dislocated worker programs who are placed in unsubsidized employment, for up to 12 months after the first day of employment. While follow-up services must be
made available, not all of the adults and dislocated workers who are registered and placed into unsubsidized employment will need or want such services. Also, the intensity of the appropriate follow-up services may vary among different participants. Participants who have multiple employment barriers and limited work histories may be in need of significant follow-up services to ensure long-term success in the labor market. Other participants may identify an area of weakness in the training provided prior to placement that will affect their ability to progress further in their occupation to retain employment. Refer to WIOA Title I & III Guide Section 1-11.

**Follow-up services could include, but are not limited to:**

1. Additional career planning and counseling to help the customer resolve work-related issues and/or secure a better paying job
2. Contact with the participant's employer, including assistance with work-related problems that may arise
3. Peer support groups
4. Information about additional educational opportunities and referral to supportive services available in the community
5. Case management administrative follow-up
6. Other services

Any supportive services required after exit shall be addressed as a referral to a community partner for Adults and Dislocated Workers.

**Note:** Follow-up begins with employment (when needed), not necessarily exit. To avoid unnecessarily extending exit after employed, staff should make use of case notes only and close activities appropriately. Verbal or written contact by staff with a participant or employer merely to confirm the participant is still employed is not necessary unless supplemental employment information is needed for performance outcome documentation or done as part of retention efforts/services. Supplemental data is pulled from the quarterly follow-up employment fields. Entering and retention in the military is only captured when keyed as supplemental data for each quarter.

The following follow-up (F) activities are available to select for Adult and Dislocated Worker customers only. Activity codes should be keyed in www.NCWorks.gov with a case note detailing context of service.

**Note:** (In the future, new services may be added to NCWorks for “after employment” that would not extend exit.)

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<th>Code</th>
<th>Description</th>
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<tr>
<td>P20</td>
<td>Adult Follow Up Services Pre-Exit</td>
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<tr>
<td>F20</td>
<td>Adult Follow Up Services Post-Exit</td>
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**Note:** Funds may not be expended on Adults/Dislocated Workers after exit has occurred.
Follow-up Services for Youth
All youth must receive some form of follow-up services for not less than 12 months after the completion of participation. Follow-up services may be provided beyond 12 months at the state or local board’s discretion; however, at this time the local area has opted to conduct only 12 months of follow-up for youth. 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. However, follow-up services must include more than a contact attempted or a contact made just for securing documentation/information.

As described in TEGL 21-16, follow-up services are critical services following a youth’s exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Refer to WIOA Title I & III Guide Section 2-9 for information on follow-up services for youth.

Examples of follow-up services for youth include:
1) Referral to Community Resources;
2) Tracking Progress on the Job;
3) Work Related Peer Support Group;
4) Assistance Securing Better Paying Job;
5) Career Development and Further Education Planning;
6) Assistance with Job/Work Related Problems
7) Adult Mentoring;
8) Provided Support Services;
9) Financial Literacy Education and Follow-up;
10) Provide Labor Market and Employment Information During Follow-up.

While a follow-up service should include more than just a contact attempted or made for securing documentation for the case file in order to report a performance outcome, regular contact with the participant to ensure youth successfully continue in their placement of employment, or post-secondary education, may be a sufficient follow-up service as long as the case manager has assessed whether the participant needs anything beyond the regular contact and determined they do not need additional services.

As a reminder, if the career advisor learns from communication with the youth that he/she is, at that time, not in need of additional services or assistance, case managers must fully document the details of that conversation in the case file. This would include documenting the questions that led the case manager to assess the youth is not in need of services or assistance, such as those pertaining to whether or not a youth is in need of transportation, child care, appropriate work attire, support or mentoring to retain employment or remain in education, health and/or mental health services, or any other services or assistance that can help a youth achieve the goals outlined in his/her IEP/ISS.

Note: In the event following exit a youth refuses to divulge information or has relocated out of state with no intention of returning, follow-up contact attempts may cease. However, the Career Advisor must
document their attempts in a General Case Note for verification and monitoring purposes. Do not Open up an Activity Note to document your attempts instead use a General Case Note.

The frequency and type of follow-up provided should be based on the need of the young adult during the 12-month period after exit. These services should continue to support the participant as they move forward in adult roles and responsibilities. Staff should approach follow-up services in a manner that will assist with successful transition and completion of program goals for successful performance outcomes. The delivery of follow-up services becomes increasingly important and may influence outcomes such as retention and earnings of participants.

While some young adults will need more intensive or frequent follow-up services than others (especially if newly employed), a monthly follow-up is a minimum expectation for each youth. Each follow-up service and attempt should be documented in NCWorks Online by adding follow-up (F) activities and case notes as appropriate.

Any WIOA Youth follow-up service is allowable if it is determined an individual need such services. As discussed in 20 CFR 681.580, the type of follow-up services provided is based on the needs of the participant. The local area policy allows supportive services or incentives tied to a goal in the youth’s IEP/ISS to be an allowable expense after exit. As long as the participant is still in his/her follow-up services period, there is no need to re-enroll a participant in the WIOA Youth program following exit in order to receive further services. Such services are considered part of follow-up services. Note: WIOA funds (such as supportive services) may be expended on (Youth) participants during follow-up services given it is part of their follow-up plan and supports completion of WIOA goals. Paid work experience is not permitted during the follow-up period.

It is inappropriate to limit youth follow-up to activities such as:
1) Quarterly phone calls to check to see if the youth is still working or still in school;
2) Mail/E-mail/Social Media surveys to check if the youth is still working or still in school; or
3) Letters to inquire about status.

In the event staff are unable to contact the participant via telephone, efforts can also be made by mailings, emails, and/or social media and should be documented.

References
The WIOA Title I Section 129(c)(2)(I), 20 CFR 681.580, TEGL 21-16

NCWorks lists the below follow-up (F) activities and when provided, should be keyed in NCWorks Online with a case note. After exit occurs, only follow-up “F” activities may be keyed by staff.
Exiting and Performance
At the end of each quarter during the follow-up year, staff should complete the corresponding first through fourth quarter after exit field. If the participant has earned a credential or entered advanced training/military after exit, this should be answered in the corresponding quarterly section in which it occurred (which may positively impact performance outcomes). Refer to WIOA Title I & III Guide Section 1-13 for information on performance and exiting WIOA Title I programs.

All WIOA staff must save and maintain the current Date Ranges for Performance located on NCWorks Online under Staff Online Resources for their personal reference.

Performance Indicators
NCWorks Online calculates performance measures by the outcomes entered into activities. Example: participant completed Occupational Skills Training and the selection for outcome is “successfully completed” then the systems picks up that the participant completed Occupational Skills Training and received a credential. After exit from all programs, participants will be included in the WIOA established common performance measures (which apply across the four core programs authorized by the Act). Common performance measures include:

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<td>F1</td>
<td>Referral to Community Resources</td>
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<td>Tracking Progress on the Job</td>
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<td>F4</td>
<td>Work Related Peer Support Group</td>
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<td>F5</td>
<td>Assistance securing better paying job</td>
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<td>F6</td>
<td>Career development and further education planning</td>
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<td>F7</td>
<td>Assistance with Job/Work Related Problems</td>
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<td>F8</td>
<td>Adult Mentoring</td>
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<td>F11</td>
<td>Supportive Services</td>
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<td>F18</td>
<td>Financial Literacy Education</td>
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<td>F19</td>
<td>Provide Labor Market and Employment Information</td>
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1. Entered Employment Rate
2. Retention Rate
3. Median Earnings
4. Credential Rate
5. In Program Skills Gain
6. Effectiveness in Serving Employers

**Note:** Since this indicator is a new approach for measuring performance under WIOA’s six core programs, the Department of Labor (DOL) has implemented a pilot program during which States must select two of the three approaches that will be used for measuring the Effectiveness in Serving Employers. DOL will evaluate State experiences with the various approaches and plan to identify a standardized indicator that DOL anticipates on implementing in Program Year 2020.

Given that most measures are calculated after exit, it is important for staff to understand how follow-up/exit services may impact the regions performance outcomes. With all measures, case notes should support the data keyed.

For example, **credential attainment** for participants, can be earned up to one year after exit. Credentials earned after exit, must be keyed into the corresponding follow-up quarter it is earned for credit to be received (with verification scanned into NCWorks documents under Measurable Skills Gain and Credential).

Measures related to **entered employment, employment retention, and earnings** have data that is pulled from a separate wage system at the 2nd and 4th quarter after exit. While this data is not keyed by staff (it is reported by employers), staff should be providing the necessary basic services to ensure that participants continue to be employed after exit to positively impact performance outcomes for the region.

For youth retention in **education/training**, staff must complete the corresponding quarterly follow-up box for the 2nd and 4th quarters if the participant remains in training to positively impact this measure. Staff should consider what follow-up services may be needed to assist youth with retention in education and/or employment. A copy of the customer’s transcript or school records can be provided after exit and must be keyed into the corresponding follow-up quarter (with verification scanned into NCWorks under the Follow-up Tab for the 2nd and 4th quarters and EDIT Exit/Outcome Tab).

**Measurable skills gain** is the only measure captured during active enrollment (live). Included are the number of in-program participants in an education or training program that leads to a postsecondary credential or employment and are achieving skill gains in one of the following:

1. Educational Achievement
2. HS Diploma or equivalent
4. Training milestone
To document the outcomes for the Measurable Skills Gain attained by the customer staff must scan the appropriate verification documentation in NCWorks under the Measurable Skills Gain Tab).

Communicating Case Closures/Exits to Participants
Staff may contact participants verbally or in written format to notify them of their inactivity in the program. This will give them the opportunity to confirm whether they wish to continue participate in the WIOA Title I staff-assisted services.

NCWorks Online Alerts
Case management staff are required to set NCWorks Online alerts to assist to help them monitor upcoming exits and current cases. The following Alerts should be utilized by staff:

WIOA Activity Projected Start Date, WIOA Activity Projected End Date, WIOA Soft Exit, WIOA Male Participants about to turn 18, WIOA Followup Alert, WIOA Literacy Numeracy Pre-Test has not been posted, WIOA Literacy Numeracy Post-Test has not been posted, Individual # of Days Since Last Workforce Innovation Opportunity Act (WIOA) Activity, IEP Goals Alert, IEP Objectives Alert, IEP Objectives Nearing Review Date of Completion for Case Managers, IEP Goals Nearing Estimated Completion Date for Case Managers
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<tr>
<th>Select</th>
<th>Alert Description</th>
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<td>This alert will notify you when an individual in your case load has a projected</td>
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<td>WIOA activity start date that is about to occur.</td>
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<td>WIOA activity end date that is about to occur.</td>
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<td>exit from the WIOA program.</td>
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<td>WIOA Male Participants about to turn 18</td>
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<td>This alert will notify you when an individual in your case load is about to turn</td>
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<td>18 years of age.</td>
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<td>WIOA Younger Youth Goals About to Expire</td>
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<td>This alert will notify you when an individual with Youth Goals is about to expire</td>
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<td>where the status is set but attainment is pending.</td>
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<td>WIOA Participants expiring work authorization</td>
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<td>This alert will notify you when an Individual in your case load whose authorization</td>
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<td>to work is about to expire.</td>
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<td>WIOA Followup Alert</td>
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<td>This alert will notify you when an individual in your case load has a follow-up</td>
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<td>date that is nearing.</td>
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<td>This alert will notify you when a Youth is enrolled that meets the requirement for</td>
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<td>literacy numeracy testing has not had a pre-test posted within 60 days of their</td>
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<td>first youth service date.</td>
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<td>WIOA Literacy Numeracy Post-Test has not been posted</td>
<td>None Selected</td>
<td>• On the day only</td>
</tr>
<tr>
<td></td>
<td>The following individual(s) in your case load who have Literacy Numeracy Pre-test</td>
<td></td>
<td>○ Everyday after</td>
</tr>
<tr>
<td></td>
<td>s approaching their anniversary date in xx days xx (from number of Days (e.g. 15)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>as of SYSTEM DATE. You should update the literacy numeracy records appropriately.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>Individual # of Days Since Last Workforce Innovation Opportunity Act (WIOA) Activity</td>
<td>None Selected</td>
<td>• On the day only</td>
</tr>
<tr>
<td></td>
<td>This alert will notify you when an Individual in your case load has not generated</td>
<td></td>
<td>○ Everyday after</td>
</tr>
<tr>
<td></td>
<td>any new WIOA activity since the number of days specified.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□</td>
<td>WIOA Pre Applications Pending</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>This alert will notify you of pending WIOA Pre-Applications that are completed by</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>individuals.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Best Practices

- Ensure all information is captured for performance measures
- Review file to make sure no further services are needed
- Review entire file/documents for accuracy
- Review file to ensure all eligibility and data validation documents are included
- Confirm all information and notes are up-to-date activities
- Review outcomes to ensure they are completed and recorded in activities for performance measures (this is where performance is captured)
- Ensure all activities are closed

**Note:** *WIOA Contractors and staff shall be held solely responsible for all information in participant files/the data entered in NCWorks Online.*