



**WORKFORCE INNOVATION AND OPPORTUNITY ACT
(WIOA)
PROGRAM POLICY NOTICE NO. 11**

EFFECTIVE DATE: JANUARY 11, 2019

SUBJECT: CO-ENROLLMENT

PURPOSE.

This policy provides instruction and guidance regarding co-enrollment across the WIOA youth and adult funding streams and serves to encourage coordination and leveraging of resources among these two workforce system partners. The New Mexico Department of Workforce Solutions (NMDWS) outlines its expectations on co-enrollment and the framework for case management; file management and documentation requirements to support co-enrollment in policy.

BACKGROUND.

The Workforce Innovation and Opportunity Act is designed to encourage coordination across partner agencies to help job seekers and business customers with a wide range of services. Work force Partners who provide service to these populations have varied program designs, eligibility and participation requirements and may have unique performance outcome goals. Enrollment in more than one program at a time provides a comprehensive menu of services and activities to help an individual get and keep a job.

POLICY.

Co-enrollment:

No single partner can be everything to every customer, so it is critical to leverage the limited resources through the use of co-enrollment. When appropriate, the state administrative entity encourages partners to co-enroll across funding streams to leverage resources, eliminate duplication, and meet the needs and expectations of customers. Leveraging resources is not just an opportunity but an economic, programmatic and social reality in the current and projected funding environment. The state administrative entity considers co-enrollment a strategic necessity in the context of limited and diminishing resources. Co-enrollment necessitates a greater level of communication and coordination, and can involve staff from different offices and with specialties in different disciplines. Coordination of services in a customer-focused manner minimizes the possibility of subsequent reentry into the system

in cases where necessary services were not provided or identified barriers were not addressed. Coordination among partners also enhances performance outcomes across individual programs and facilitates cooperation across programs within the workforce system.

General population system entry: Wagner-Peyser is the typical point of entry for workforce system customers. Individuals seeking workforce development services will be registered as Wagner-Peyser program participants. Once registered as Wagner-Peyser program participants, individual attention will be given to job seekers using a triage approach that focuses on the most appropriate next step based on need. Wagner-Peyser participants, who require additional services, may be subsequently co-enrolled in the WIA adult or youth programs in addition to other partner programs. WIA youth participants may be co-enrolled in all appropriate programs that serve youth that will enable a holistic approach to service provision, such as discretionary grant programs. Older youth (18 or older) may be co-enrolled in the WIA adult program.

Point of participation: Although the TEGL 17-05 requires a common exit date across the DOL funded *required* system partner programs, TEGL 17-05 gives states flexibility to determine the point of participation when an individual receives services from multiple programs; Specifically, Wagner-Peyser, WIA adult, and WIA youth training and services. New Mexico is not implementing a common participation date at this time; therefore, individuals participating in multiple programs (i.e., co-enrolled individuals) may have a different date of participation across programs.

Participant defined: The term “participant” is defined as an individual determined eligible to participate in a program. Only “qualifying” services, however, will trigger participation in most cases, as described below. Once these participants exit, they will be included in performance calculations. For the core workforce programs, this translates into the following.

(1) **Wagner-Peyser.** There are no eligibility requirements for Wagner-Peyser participants. Any service will trigger participation as long as the individual registers in the New Mexico Workforce Connection Online System (NMWCOS) or other management information system designated by the state and is, therefore, identifiable. In other words, an individual who anonymously browses the system will not be captured for self-directed core service reporting or performance calculations. All registered Wagner-Peyser participants are included in Wagner-Peyser participant counts and Wagner-Peyser performance calculations.

(2) **WIOA adults.** Consistent with the previous subsection, since WIOA funding supports the state’s management information system, individuals who are identifiable, eligible, and who receive any level of service will be included in WIA (adult) participant counts. Individuals who receive only Basic Career Services without significant staff involvement activities will not be included in performance calculations. The point of participation and inclusion in performance calculations after exit is triggered when a WIOA-funded qualifying service is received. The date of participation (i.e., for performance purposes) is the date of first qualifying service, as discussed later.

(3) WIA youth. The WIA youth program also has specific eligibility requirements; however, unlike the adult and dislocated worker programs, which are based on graduated levels of service, any WIOA-funded youth activity will trigger participation. Therefore, the point of participation for youth is after eligibility determination and receipt of the first youth activity. These youth participants are included in performance calculations.

Services that commence participation.

(1) Career service with significant staff involvement. For WIOA adults and dislocated workers, any staff-assisted career service(s) with significant staff involvement.

(2) Career service by partner staff. Receipt of any career service by a partner program prior to participation in a WIA Title I-funded program satisfies the requirement to provide a core service before an intensive-level service. The WIA program does not also have to provide a core-level service if a partner program has already done so.

POINT OF EXIT: The requirement for a common exit date across the core workforce programs, at a minimum, supports the philosophy of integrated service delivery and leveraging limited resources via co-enrollment options. This acknowledges that an “exit” should be an exit from the workforce system and not an individual program or activity. Based on TEGl 17-05, an exit occurs when a participant has not received a service for 90 consecutive days, has no documented gap in service, and is not scheduled for future services. After the 90 days of no service, the exit date is applied retroactively to the last date of service. The exit date is critical because federal common measures are based on this date.

A. Exit date. The exit date is derived by the system after a participant has not received any qualifying service for 90 consecutive days, has no documented gap in service, and is not scheduled for future services. The program or activity completion date may or may not coincide with the system-derived actual exit date. This is particularly true if a subsequent qualifying service from another program, such as Wagner-Peyser, is provided prior to the end of the 90-day period.

B. Services that extend exit. There are some services that can extend the exit date and services that cannot extend the exit date.

(1) Services that can extend the exit date are DOL funded required system partner services. Wagner-Peyser and other needs-related payments funded by the Trade Act, WIOA or NEG grants that are tied to continuous participation can also extend exit.

(2) Services that cannot extend the exit date are listed below:

(a) Case management and follow up activities of an administrative nature that involve regular contact to obtain information regarding employment status, educational progress, or need for additional services.

(b) Income maintenance or support payments (e.g., UI, TANF).

- (c) Post-employment follow-up services designed to verify job retention, wage gains and career progress.

CASE MANAGEMENT, FILE MANAGEMENT AND DOCUMENTATION REQUIREMENTS TO SUPPORT CO-ENROLLMENT: In a customer-focused environment that leverages limited resources, it would be most productive to coordinate services and case management as appropriate across multiple programs.

A. Co-enrollment key parameters.

- (1) The majority of workforce system participants will begin with Wagner-Peyser enrollment, which may provide sufficient services without co-enrollment.
- (2) If additional services are needed for an eligible and suitable participant, the individual may be co-enrolled in WIOA programs.
- (3) All WIOA adult and dislocated worker participants shall be co-enrolled in Wagner-Peyser, but not all Wagner-Peyser participants may be co-enrolled in WIOA programs.
- (4) Wagner-Peyser participants who are veterans will be co-enrolled in VETS-funded programs and may subsequently be co-enrolled in WIOA programs and will follow priority of service for this segment of the population.
- (5) WIOA dislocated worker participants may be co-enrolled in a WIOA adult program.
- (6) WIOA youth participants who are 18 years of age or above may be co-enrolled in the WIA adult program and may be co-enrolled in Wagner Peyser.
- (7) When practical, participants should have one case manager who will serve as their primary contact. When transitioning from one program to another (i.e. WIOA Youth Program) to WIOA Adult/Dislocated Worker, both caseworkers should conduct a review of the file and plan to ensure continuity of services and perform introductions to new clients and staff (as necessary) and outline what services will be conducted by whom.
- (8) The case manager obtains and maintains all required information, including documentation pertaining to eligibility and documentation to support federal data validation. Copies of pertinent data will be exchanged between case managers as needed and outlined below.
- (9) If case management functions are coordinated across multiple programs, the case managers are required to have a practical understanding of data validation requirements and documentation across the various programs to insure that providers of the services have necessary information for individual audits of each provider.

Case management, file management and documentation. Staff that "owns" the case file as described in the following subsections will be required to ensure all appropriate information and documentation supporting the entire service plan and service history of the individual has been obtained and can be tracked. MOU(s) will be put in place to allow free exchange of information and to maintain confidentiality of client information. This is intended to fulfill federal audit requirements and to support the enhanced level of coordination and case management that co-enrollment requires. Specific case management, file management, and documentation requirements are as follows.

- (1) **Wagner Peyser participants only:**
 - (a) Case management: none.
 - (b) File management: only electronic case file; hard copy file not required.
 - (c) Documentation: none. However, all services shall be data-entered in NM NMWCOS.
- (2) **Wagner Peyser plus WIOA staff-assisted career services without significant staff assistance:**
 - (a) Case management: none.
 - (b) File management: only electronic case file; hard copy file not required.
 - (c) Documentation: none. However, all services shall be data-entered in NMWCOS.
- (3) **Wagner Peyser plus WIOA staff-assisted career services with significant staff assistance:**
 - (a) Case management: WIOA adult program.
 - (b) File management: WIOA case manager.
 - (c) Documentation: WIOA case manager responsible for basic information, including eligibility documentation and documentation needed for prioritization (at point of enrollment into paid activity) and data validation purposes, which consists of staff verification of date of birth and self-attested information for all other elements.
- (4) **WIOA youth:**
 - (a) Case management: WIOA youth program.
 - (b) File management: WIOA youth case manager.
 - (c) Documentation: WIOA youth case manager responsible for all WIOA Youth eligibility and data validation documentation, including for subsequent co-enrollments.

This policy rescinds any previous NALWDB policy regarding subject.

INQUIRIES: Contact WIOA Program Manager at 505-986-0363.


NALWDB CHAIR


DATE