



WORKFORCE INNOVATION AND OPPORTUNITY PROGRAM POLICY NOTICE NO. 11, Rev. 2

EFFECTIVE DATE: September 15, 2025

SUBJECT: CO-ENROLLMENT

PURPOSE

This policy provides instruction and guidance regarding co-enrollment across the WIOA Youth and Adult funding streams and encourages coordination and leveraging of resources between these workforce system partners. The New Mexico Department of Workforce Solutions (NMDWS) establishes expectations for co-enrollment, case management, file management, and documentation to support co-enrollment in state policy. Specifically, New Mexico's **11.2.8.16 NMAC** authorizes concurrent participation in WIOA Title I Youth and Title I Adult programs where eligibility permits. Moreover, **20 C.F.R. §681.430** allows youth who meet both adult and youth eligibility requirements to be co-enrolled in both programs concurrently.

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 by 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 recognizes co-enrollment as a strategic necessity considering limited and diminishing resources. Effective co-enrollment requires enhanced communication, collaboration, and coordination among staff across programs, offices, and areas of expertise. Delivering services in a customer-centered and coordinated manner helps ensure that participants receive the full range of supports they need, reducing the likelihood of re-entry into the system due to unmet needs or unaddressed barriers. Strengthened coordination among partners not only improves individual participant outcomes but also enhances overall program performance and promotes a more integrated, cooperative 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 is 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 WIOA adult or youth programs in addition to other partner programs. WIOA 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 WIOA adult program.

Point of participation:

Although **TEGL 10-16**, Change 1 establishes a common exit requirement across all DOL-funded core and required partner programs, it provides states with flexibility in defining the point of participation when individuals receive services from multiple programs, specifically Wagner-Peyser, WIOA Adult, and WIOA Youth programs. Currently, the State of New Mexico has elected not to implement a common participation date. Consequently, individuals who are co-enrolled in multiple programs may have different dates of participation across those 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 America's Job Center www.jobs.state.nm.us (NMJOBS) 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 WIOA (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) **WIOA youth.** The WIOA 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.

(4) **Procedures for Enrolling Youth Participants**

A. Eligibility Verification

- a. Youth eligibility must be established prior to enrollment using required documentation that verifies age, citizenship or work authorization, selective service (if applicable), and barrier categories (e.g., low income, basic skills deficient, foster youth, etc.) as outlined in **20 CFR §681.210–§681.250 and TEGL 21-16, Change 1.**
- b. Self-attestation may only be used when no other documentation is reasonably available and must be supported by a clear case note justification.

B. Objective Assessment and ISS Development

- a. Upon determining eligibility, staff must complete a comprehensive Objective Assessment identifying academic skill levels, work history, employability, and barriers to employment.
- b. Based on that assessment, an **Individual Service Strategy (ISS)** must be developed, documenting short- and long-term goals, planned services, measurable objectives, and anticipated outcomes, per **20 CFR §681.420.**
- c. The ISS must be signed by both the youth and case manager and updated regularly as progress occurs.

C. Program Enrollment and Participation

- a. The point of participation occurs when the youth has completed eligibility determination and receives the first WIOA-funded service.
- b. The first service must be recorded in the state case management system (**NMJOBS**) as a reportable youth activity.
- c. Participation triggers inclusion in federal performance accountability measures per **TEGL 10-16, Change 1.**

D. Documentation and File Management

- a. Each youth file must include eligibility documentation, objective assessment results, the ISS, service and activity documentation, case notes, and verification of all training or supportive services provided.
- b. All documentation must be stored securely and retained for a minimum of five (5) years after the program closeout year ends, in accordance with **2 CFR §200.334** and NMDWS policy.

E. Co-Enrollment and Service Coordination

- a. Youth who meet eligibility for both Youth and Adult programs may be co-enrolled to maximize service coordination and resource use, consistent with **20 CFR §681.430** and NMDWS Co-Enrollment Policy.
- b. In such cases, case managers must ensure coordinated ISS and IEP documentation and avoid duplication of services.

F. Participation and Exit

- a. Youth remain active participants as long as they receive reportable services.



- b. An exit occurs when the youth has not received a WIOA-funded service for 90 consecutive calendar days and has no planned future services, as defined in **TEGL 10-16, Change 1**.
- c. The exit date is applied retroactively to the last date of service.

G. Services That Commence Participation.

- a. Career service with significant staff involvement. For WIOA adults and dislocated workers, any staff-assisted career service(s) with significant staff involvement.
- b. Career service by partner staff. Receipt of any career service by a partner program prior to participation in a WIOA Title I-funded program satisfies the requirement to provide a core service before an intensive-level service. The WIOA 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 core workforce programs reinforces the philosophy of integrated service delivery and the efficient use of limited resources through co-enrollment. This approach recognizes that an “exit” represents a participant’s separation from the workforce development system, rather than from an individual program or activity. Under **TEGL 10-16, Change 1**, an exit occurs when a participant has not received a reportable service for 90 consecutive calendar days, has no planned gap in service, and is not scheduled to receive future services. After the 90-day period, the exit date is applied retroactively to the last date of service received. The exit date is a critical data element, as federal performance indicators (such as employment, credential attainment, and measurable skill gains) are calculated based on the participant’s exit date across all DOL-funded core program 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.

A. 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 need-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 are 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) Most 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 WIOA 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 ensure that providers of the services have necessary information for individual audits of each provider.

Case Management, File Management and Documentation.

Staff that "owns" the participant case files must be maintained electronically in the approved case management system (NMJOBS) and/or the designated secure file repository. Files must be organized, complete, and capable of supporting eligibility determinations, service delivery, and performance reporting at any time during monitoring or audit review. Electronic files must include all required documentation such as eligibility verification forms, assessments, service plans (ISS/IEP), activity entries, time and attendance records, training documentation, case notes, progress reports, and follow-up



evidence. Each uploaded document must be clearly labeled using consistent file naming conventions that identify the participant's name, document type, and date of creation (for example: *Smith_Jane_state ID_2025-02-03*). All uploaded documents must be legible, dated, and verified for accuracy. Duplicate, outdated, or incomplete versions must be removed to ensure the integrity and accuracy of the participant record. Paper documents that are scanned into the system must remain available until the electronic version is confirmed as clear and complete. Access to electronic files must be limited to authorized personnel only, consistent with confidentiality provisions under **20 CFR §683.220, 2 CFR §200.303(e)**. Any exchange of case information between partner agencies must be covered by a valid Memorandum of Understanding (MOU) or Data Sharing Agreement, ensuring compliance with state and federal privacy laws. All documentation must be retained for a minimum of five (5) years after the closure of the program year in which the participant's file was closed, or longer if required by audit or litigation, in accordance with **2 CFR §200.334** and **1.4.1.57 NMAC**. The case file must reflect a full and accurate record of participant eligibility, services received, outcomes achieved, and any expenditure charged to WIOA funds. These standards are intended to maintain uniformity in electronic file management, safeguard confidential information, and ensure the transparency and accountability of all program activities conducted under the Northern Area Local Workforce Development Board (NALWDB) and the New Mexico Department of Workforce Solutions (NMDWS).

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 NMJOBS.

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) (c) Documentation: none. However, all services shall be data-entered in NMJOBS.

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.

WIOA Youth:

(d) Case management: WIOA youth program.

(e) File management: WIOA youth case manager.

(f) 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.

Board Chair:  Joseph Weathers (Oct 28, 2025 09:43:25 MDT)

Date: 10/28/25

