

Operational Policy NO. OP- 422-A

Subject: Participation and Co-Enrollment

Effective: PY12 – 02/25/2013

Rescissions: Policy NO, OP-414 and OP- 415

BACKGROUND:

The WIA is designed to encourage coordination across partner agencies to help job seekers and business customers with a wide range of services. New Mexico workforce connection centers (center) provide a single location for customers to access these services. Partners who provide services through centers have varied 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.

OBJECTIVE:

This policy provides instruction and guidance regarding co-enrollments across funding streams and serves to encourage coordination and leveraging of resources among workforce system partners (partners). In this policy, the DWS/state administrative entity outlines its expectations on co-enrollment and the framework for case management, file management and documentation requirements to support co-enrollment.

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 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 needed services were not provided or possible barriers not addressed. Coordination among partners also enhances performance outcomes across individual programs and facilitates the synergy across programs at the heart of 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 program in addition to other partner programs.

Dislocated worker system entry. Individuals may initially present as dislocated workers. In these instances, the individual may not begin their system enrollment as a Wagner-Peyser participant, although they will be subsequently co-enrolled in Wagner-Peyser. If a Trade Act petition is certified, co-enrollment between WIA dislocated worker and Trade Act programs is encouraged. In addition, an eligible WIA dislocated worker may be co-enrolled in the WIA adult program.

Youth system entry. WIA youth participants may be co-enrolled in all appropriate programs that serve youth, such as discretionary grant programs. Older youth may be co-enrolled in the WIA adult program.

[11.2.10.9 NMAC - N, 8-15-2012]

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, WIA dislocated worker, WIA national emergency grant (NEG), WIA youth, Trade Act, and veterans' employment and training services (VETS). 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 who receives a service funded by the 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 NM virtual one stop system (NMVOSS) 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) **WIA adults.** Consistent with the previous subsection, since WIA 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 self-directed core service or staff-assisted core services without significant staff involvement activities will not be included in performance calculations as addressed in 11.2.9 NMAC, Adult and Dislocated Worker Services. The point of participation and inclusion in performance calculations after exit is

triggered when a WIA-funded qualifying service is received. The date of participation (i.e., for performance purposes) is the date of first qualifying service, as discussed later. The WIA adult program eligibility requirements are discussed in 11.2.8 NMAC, WIA Participant Eligibility.

(3) WIA dislocated workers. The WIA dislocated worker program has specific eligibility requirements, consistent with WIA section 101(9) and 11.2.8 NMAC, WIA Participant Eligibility. Therefore, the point of participation for this target group is after eligibility determination and receipt of the first dislocated worker-funded qualifying service. The date of participation (i.e., for performance purposes) is the date of first qualifying service.

(4) WIA youth. The WIA youth program also has specific eligibility requirements, consistent with WIA section 101(13) and 11.2.8 NMAC, WIA Participant Eligibility. However, unlike the adult and dislocated worker programs, which are based on graduated levels of service, any WIA-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.

(5) Trade Act. The point of participation is after eligibility determination, consistent with federal guidelines and receipt of a trade-funded service. The date of participation is the date of first qualifying service.

(6) Veterans' employment and training services (VETS). The point of participation is after eligibility determination, consistent with federal guidelines and receipt of a qualifying service provided by a local veterans' employment representative (LVER) or disabled veterans' outreach program (DVOP) specialist.

Services that commence participation. This phrase has the same meaning as the phrase "services that trigger participation" or the phrase "qualifying services" when used in the context of participation. The phrase does not apply to Wagner-Peyser programs because, as previously noted, any Wagner-Peyser funded service will trigger inclusion in participant counts and performance calculations for that program. Likewise, the phrase does not apply to WIA youth programs because any WIA-funded youth activity will trigger inclusion in youth participant counts and appropriate performance calculations. Also note that eligibility determination by itself does not trigger participation. By definition, a participant shall be determined eligible and receive a program-funded service. In addition to program eligibility requirements, and consistent with 11.2.8 NMAC, WIA Participant Eligibility and 11.2.9 NMAC, Adult and Dislocated Worker Services, the following services will trigger participation (and inclusion in performance calculations) for the remaining core workforce programs.

(1) Core service with significant staff involvement. For WIA adults and dislocated workers, any staff-assisted core service(s) with significant staff involvement.

(2) Core service by partner staff. If a staff-assisted core service has been provided to an individual by a separate one-stop partner such as Wagner-Peyser or VETS, regardless of whether the staff-assisted core service was with or without significant staff involvement, WIA adult and dislocated worker participation can be triggered at the intensive service level, consistent with WIA Section 134(d)(3). In other words, receipt of any staff-assisted core 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.

[11.2.10.10 NMAC - N, 8-15-2012]

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. In other words, in the same way there are “qualifying” services in order to be considered a participant for performance purposes, there are also qualifying services that can and cannot extend the exit date as follows.

(1) Services that can extend the exit date are DOL funded required system partner services. Trade readjustment allowances and other needs-related payments funded by Trade Act, WIA 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.

[11.2.10.11 NMAC - N, 8-15-2012]

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 WIA programs.

(3) All WIA adult and dislocated worker participants shall be co-enrolled in Wagner-Peyser, but not all Wagner-Peyser participants will be co-enrolled in WIA programs.

(4) Wagner-Peyser participants who are veterans will be co-enrolled in VETS-funded programs and may subsequently be co-enrolled in WIA programs.

(5) WIA dislocated worker participants may be co-enrolled in a WIA adult program.

(6) All national emergency grant participants shall be co-enrolled in Wagner-Peyser and shall be co-enrolled in the WIA dislocated worker program and may be co-enrolled in the WIA adult program.

(7) All Trade Act participants shall be co-enrolled in Wagner-Peyser, should also be co-enrolled in the WIA dislocated worker program, and may be co-enrolled in the WIA adult program.

(8) WIA 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.

(9) When practical, participants should have one case manager who will serve as their primary contact.

(10) The case manager obtains and maintains all required information, including documentation pertaining to eligibility and documentation to support federal data validation.

(11) 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.

(12) In the case of a disabled veteran working with a disabled veterans' outreach program specialist, the participant shall have two case managers. In the disabled veteran example, the WIA case manager working with the individual will also maintain their own case file.

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. 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 VOSS.

(2) Wagner Peyser plus WIA staff-assisted core 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 NM VOSS.

(3) Wagner Peyser plus WIA staff-assisted core services with significant staff assistance.

(a) Case management: minimal by WIA adult program.

(b) File management: WIA case manager.

(c) Documentation: WIA case manager responsible for basic information, including eligibility documentation and documentation needed for data validation purposes, which consists of staff verification of date of birth and self-attested information for all other elements.

(4) Wagner-Peyser identified as veterans, not disabled.

(a) Case management: none unless co-enrolled in WIA adult program.

(b) File management: local veterans' employment representative responsible for eligibility documentation (e.g., DD-214); WIA case manager becomes responsible for all subsequent documentation if co-enrollment occurs.

(c) Documentation: If co-enrollment occurs, WIA case manager is responsible for all eligibility and data validation documentation (Wagner-Peyser, VETS, and WIA).

(5) Wagner-Peyser identified as disabled veterans.

(a) Case management: disabled veterans' outreach program specialist; if WIA co-enrollment occurs, WIA case manager also has case management responsibility.

(b) File management: disabled veterans' outreach program specialist maintains case file. WIA case manager maintains separate case file.

(c) Documentation: disabled veterans' outreach program specialist responsible for VETS eligibility and related data validation information. WIA case manager is responsible for eligibility and data validation information for WIA and documentation requirements for any subsequent co-enrollments.

(6) WIA dislocated workers co-enrolled in Wagner-Peyser.

(a) Case management: WIA dislocated worker program.

(b) File management: WIA dislocated worker case manager maintains case file, even if co-enrolled subsequently in WIA adult program.

(c) Documentation: WIA dislocated worker case manager responsible for all eligibility and data validation documentation including documentation requirements for any subsequent enrollment.

(7) National emergency grant.

(a) Case management: WIA dislocated worker program.

(b) File management: WIA dislocated worker case manager.

(c) Documentation: WIA dislocated worker case manager responsible for all eligibility, including national emergency grant, and data validation documentation.

(8) Trade Act.

(a) Case management: Trade Act program.

(b) File management: Trade-funded case manager. If co-enrolled in WIA, the WIA case manager will maintain a separate case file or ensure all required WIA documentation is maintained and coordinated with trade case manager.

(c) Documentation: Trade-funded and WIA case manager responsible for all eligibility and data validation documentation including that necessary for additional and subsequent co-enrollments.

(9) WIA youth.

(a) Case management: WIA youth program.

(b) File management: WIA youth case manager.

(c) Documentation: WIA youth case manager responsible for all eligibility and data validation documentation, including for subsequent co-enrollments.

[11.2.10.12 NMAC - N, 8-15-2012]

APPLICABILITY:

Chief elected officials (CEOs), local workforce development boards (local boards), local workforce system administrative entities (local administrative entities), workforce system sub-recipients and workforce system partners.

INQUIRIES:

WIA Manager- 505-247-1750

WCCNM Procedure for Co-Enrollment of Youth

ACTION:

The contracted youth provider(s) will adhere to the following procedure when a concurrent enrollment of an older or out-of-school youth in a Title I WIA program is to take place.

STEP NO. 1

Youth Provider staff will be the 'Primary' case manager. They are responsible for outreach, intake, eligibility determination, performing an objective assessment and development of an Individual Service Strategy (ISS), which will be used in lieu of the Employability Development Plan (EDP). The ISS must state the type of co-enrollment activity to take place. Youth Provider will also document a referral to the adult/dw program for services in the file. All **ORIGINAL** documents generated in this step will be maintained in the clients' folder at the Youth Provider(s) location(s).

Youth Provider staff will be responsible for entry of all information into VOS of youth activities; youth activity codes (i.e., Orientation, Objective Assessment, ISS, Occupational

Skills Training and pertaining Supportive Services). Case notes/Counseling notes should reflect the completion of these items as well as the transfer of the file for co-enrollment activity.

STEP NO. 2

Youth Provider staff will generate and provide the Adult/Dislocated Worker Provider staff with a “Traveling File” that will be clearly indicated as a Co-enrollment by staff writing the words “**Co-enrollment**” on the file. The traveling file must contain “copies” of the following documents:

- Counseling notes form;
- A completed WIA-1 and WIA-2;
- Printed VOS Program screen which reflects the activities;
- Income Verification documents;
- Income Calculation form;
- General Eligibility Determination Documents (i.e., Birth Certificate or Affidavit, Social Security card, Selective Service etc.);
- A completed and signed Individual Service Strategy form
- *Family Education Rights and Privacy Act Form (FERPA);
- Barrier Documentation;
- Signed Civil Rights Form;
- Signed Orientation Form;
- Signed Drug Free Form;
- * WIA 17Y and 18Y;
- * Fund Cap Tracking Form;
- * Documented PELL grant information;
- * ITA Participant Agreement;
- * ETPL research page with approved training program;
- * Career/Job Search and Labor Market Information Sheet;

* Only included if participating in Occupational Skills training through the youth program

STEP NO. 3

Adult/Dislocated Worker provider staff will review the file(s) for completeness and verbally notify the Youth Provider staff of the activity the youth will be enrolled into. The Youth Provider staff will be notified verbally when the client completes the training program and will receive a **COPY** of the credential/letter of completion documentation attained through the training, if applicable. The

ORIGINAL credential will be retained in the “Co-enrollment” file, if applicable.

The Adult/Dislocated Worker Provider staff will be responsible for insuring that all forms, procedures and activities are maintained in the file pertaining to any Adult/DW activities being provided. Adult/Dislocated Worker Provider staff will be responsible for entry of all information into VOS of adult/dw activities; (i.e., OJT, Occupational Skills Training, and pertaining Supportive Services).

NOTE: ALL YOUTH ELGIBILITY DOCUMENTATION WILL BE USED AND ACCEPTED AS SUFFICIENT ELIGIBILITY DOCUMENTATION BY THE ADULT/DW SERVICE PROVIDER.

The adult/dw provider staff will include the following documentation in the “Co-enrollment” file:

- Printed VOS Program screen which reflects the Adult activities;
- WIA 2 used by Adult/DW staff to reflect Adult/DW activities;
- * Career/Job Search and Labor Market Information Sheet;
- * WIA 18 and WIA 17
- * Fund Cap Tracking Form;
- * Documented PELL grant information;
- * ITA Participant/Follow Up/Civil Rights Agreement;
- *Family Education Rights and Privacy Act Form (FERPA);

- * ETPL research page with approved training program
- Counseling notes form.
- OJT forms, and information (if applicable);
- Apprenticeship form and information (if applicable);
- Intensive Training forms and information (if applicable); and
- Copies of checks (if applicable).

* Only included if participating in Occupational Skills training through the adult/dw program

STEP NO. 4

Adult/Dislocated Worker Provider staff will close out activities in VOS and provide completion information to the Youth Provider Staff. The Youth Provider Staff will be responsible for follow up activities after the participant has exited the co-enrollment program, upon completion of all training activities.

Note: All participants will be soft exited unless a global exclusion is granted.

INQUIRIES:

WIA Manager 505-247-1750.